

Exhibit 7

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.

Confidential

J.G. on 02/08/2023

1
2 IN THE UNITED STATES DISTRICT COURT
3 NORTHERN DISTRICT OF GEORGIA
4 ATLANTA DIVISION
5 J.G.,)
6)
7 Plaintiff,)
8)
9 vs.)
10) Civil Action File
11 NORTHBROOK INDUSTRIES,) No.: 1:20-cv-05233-MLB
12 INC., d/b/a UNITED INN)
13 AND SUITES,)
14)
15 Defendant.)
16)
17)
18)
19)
20)
21)
22)
23)
24)
25)

- - -

CONFIDENTIAL

The Videotaped Deposition of

J.G.

(Taken by the Defendant)

Atlanta, Georgia

February 8, 2023

Reported by: Christopher J. Tomko
Certified Court Reporter
Georgia
License No. 4802-6210-2922-0352

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 2..5**

Page 2		Page 4	
1	STATE OF GEORGIA	1	TRANSCRIPT CODES
2	COUNTY OF FULTON	2	
3	VIDEOTAPED DEPOSITION OF J.G.	3	-- Interruption/Change/Cross-Talk
4		4	. . . Incomplete thought
5	Pursuant to Article 8.B of the RULES AND	5	(sic) Word/phrase written as said
6	REGULATIONS OF THE BOARD OF COURT REPORTING OF THE	6	(PH) Word spelled phonetically
7	JUDICIAL COUNCIL OF GEORGIA, I make the following	7	
8	disclosure:	8	
9	I am a Georgia Certified Court Reporter.	9	
10	I am here as a representative of Huseby Global	10	
11	Litigation.	11	- - -
12	Huseby Global Litigation was	12	The videotaped deposition of J.G.,
13	contacted by the offices of SMITH, GAMBRELL &	13	taken by the Defendant, at Finch McCranie,
14	RUSSELL, LLP, to provide court reporting services	14	LLP, 229 Peachtree Street NE, Suite 2500,
15	for this videotaped deposition. Huseby Global	15	Atlanta, Georgia 30303, on the 8th day of
16	Litigation will not be taking this videotaped	16	February 2023, at 10:00 a.m., with the
17	deposition by O.C.G.A. 15-14-37 (a) and (b).	17	reading and signing of the deposition
18		18	transcript being waived before Christopher
19		19	J. Tomko, Certified Verbatim Court Reporter
20		20	in and for the State of Georgia.
21		21	
22		22	
23		23	
24		24	
25		25	
Page 3		Page 5	
1	APPEARANCES OF COUNSEL	1	TRANSCRIPT INDEX
2		2	
3		3	Appearance Page(s) 3
4	ON BEHALF OF THE PLAINTIFF:	4	Examination Index 6
5	DAVID H. BOUCHARD	5	Exhibit Index 7
6	Attorney-at-Law	6	Proceedings 8
7	Finch McCranie, LLP	7	Oath 9
8	229 Peachtree Street NE	8	Reporter's Disclosure 2
9	Suite 2500	9	Reporter's Certificate 151
10	Atlanta, Georgia 30303	10	
11	DAVID@FINCHMCCRANIE.COM	11	
12		12	
13	ON BEHALF OF THE DEFENDANT:	13	
14	DANA M. RICHENS	14	
15	Attorney-at-Law	15	
16	Smith, Gambrell & Russell, LLP	16	
17	1230 Peachtree Street NE	17	
18	Suite 3100	18	
19	Atlanta, Georgia 30309	19	
20	DRICHENS@SGRLAW.COM	20	
21		21	
22	ALSO PRESENT:	22	
23	Michael Bond, CLVS - Legal Videographer	23	
24		24	
25		25	

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 6..9**

			Page 6				Page 8
1	INDEX TO EXAMINATIONS			1	(The videotaped deposition of J.G. commenced at		
2	Examination of J.G.		Page	2	10:00 a.m. on February 8, 2023.)		
3	Examination by Ms. Richens		9	3	P R O C E E D I N G S		
4				4	- - -		
5				5	(Whereupon, the video camera was turned		
6				6	on.)		
7				7	THE VIDEOGRAPHER: Good morning. This		
8				8	is the beginning of Media No. 1 in the		
9				9	deposition of Jhordyn Grimes, in the matter		
10				10	of Jhordyn Grimes versus Northbrook		
11				11	Industries, Incorporated, et al.; Case		
12				12	No. 1:20-cv-05233-MLB.		
13				13	Today's date is February 8, 2023. The		
14				14	time on the monitor is 10:05 a.m.		
15				15	My name is Michael Bond, and I am the		
16				16	videographer. The court reporter is Chris		
17				17	Tomko. We are here with Huseby Global		
18				18	Litigation.		
19				19	Counsel, please introduce yourselves,		
20				20	after which the court reporter will swear		
21				21	in the witness.		
22				22	MR. BOUCHARD: Good morning. David		
23				23	Bouchard of Finch McCranie on behalf of the		
24				24	plaintiff, Jhordyn Grimes.		
25				25	MS. RICHENS: I'm Dana Richens with		

			Page 7				Page 9
1	INDEX TO EXHIBITS			1	the law firm of Smith, Gambrell & Russell		
2	Exhibit Description Page			2	on behalf of the defendant, Northbrook		
3	Defendant's Exhibits			3	Industries, Inc., d/b/a United Inn &		
4				4	Suites.		
5	Exhibit 1	Color Screenshot	129	5	J.G.,		
6	Exhibit 2	Color Screenshot	132	6	having been first duly sworn, testified as		
7	Exhibit 3	Color Screenshot	134	7	follows:		
8	Exhibit 4	Color Screenshot	136	8	EXAMINATION		
9	Exhibit 5	Color Screenshot	137	9	BY MS. RICHENS:		
10	Exhibit 6	Electronic Exhibit (Video)	143	10	Q. All right. Good morning, Ms. Grimes.		
11				11	A. Good morning.		
12				12	Q. We met before the deposition started. My		
13				13	name is Dana Richens, and I'm a lawyer in town. And		
14				14	as I mentioned when I introduced myself, I represent		
15				15	a company called Northbrook Industries, and they own		
16				16	the United Inn & Suites on Memorial Drive.		
17				17	Okay?		
18				18	A. Okay.		
19				19	MS. RICHENS: And by the way, I don't		
20				20	know that we put it on the record, maybe we		
21				21	did, but the whole deposition is to be		
22				22	designated confidential under the		
23				23	protective order.		
24				24	BY MS. RICHENS:		
25				25	Q. So I think you sort of have an idea who		

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 10..13**

Page 10	Page 12
<p>1 is in the room with us. But, obviously, Mr. Bouchard</p> <p>2 is your lawyer. Mr. Bond is the videographer, so he</p> <p>3 is -- he's videotaping you today. And then Mr. Tomko</p> <p>4 is our court reporter, and he's basically -- he's</p> <p>5 making a written transcript of what you're saying,</p> <p>6 but he's actually kind of dictating it into his</p> <p>7 little microphone. It's old-school. So he's</p> <p>8 repeating it to that -- what we are all saying, which</p> <p>9 I don't know how they do it, but --</p> <p>10 A. Yeah.</p> <p>11 Q. -- he's more coordinated that I am.</p> <p>12 So, Ms. Grimes, I'm going to ask you some</p> <p>13 questions today relating to your -- the lawsuit that</p> <p>14 your attorneys have filed on your behalf against my</p> <p>15 client, Northbrook Industries.</p> <p>16 Have you ever given a deposition before?</p> <p>17 Have you ever done this before?</p> <p>18 A. Yes, I have.</p> <p>19 Q. Okay. And tell me what the context of</p> <p>20 that was.</p> <p>21 A. It was the same thing; just a different</p> <p>22 hotel.</p> <p>23 Q. Okay. And -- and is that the only</p> <p>24 deposition you have given before this one?</p> <p>25 A. Yes, ma'am.</p>	<p>1 A. So then, yes, ma'am.</p> <p>2 Q. Okay. So you brought the lawsuit against</p> <p>3 Stone Mountain -- you sued Stone Mountain Inn &</p> <p>4 Suites?</p> <p>5 A. Correct.</p> <p>6 Q. Okay. So was the name of the lawsuit</p> <p>7 J.G. versus --</p> <p>8 A. Yes, ma'am.</p> <p>9 Q. -- Stone Mountain Inn & Suites?</p> <p>10 Okay.</p> <p>11 THE REPORTER: And if you could just</p> <p>12 let her finish the question.</p> <p>13 Thank you.</p> <p>14 BY MS. RICHENS:</p> <p>15 Q. Okay. And how -- I don't want to know</p> <p>16 any -- anything that's confidential, but how did that</p> <p>17 lawsuit end, if you know?</p> <p>18 Was there a settlement that was reached?</p> <p>19 MR. BOUCHARD: And, Jhordyn, just to</p> <p>20 reiterate what Ms. Richens just said, don't</p> <p>21 go into the details of it. You can tell</p> <p>22 her generally whether we settled the case</p> <p>23 or didn't settle the case.</p> <p>24 THE WITNESS: Yes, we settled the</p> <p>25 case.</p>
Page 11	Page 13
<p>1 Q. Okay. And what is the -- what is the</p> <p>2 hotel that is -- I guess you sued another hotel is</p> <p>3 what you're saying?</p> <p>4 A. Uh-huh.</p> <p>5 Q. Be sure to -- to give a -- a verbal</p> <p>6 response so --</p> <p>7 A. Oh, yes, ma'am.</p> <p>8 Q. -- so Mr. Tomko knows what to say in his</p> <p>9 microphone.</p> <p>10 And so you're saying there's another</p> <p>11 lawsuit in which you have sued another hotel?</p> <p>12 A. Correct.</p> <p>13 Q. Okay. And what is the name of the other</p> <p>14 hotel?</p> <p>15 A. Stone Mountain Inn & Suites.</p> <p>16 Q. Okay. And is that lawsuit ongoing, or</p> <p>17 has it concluded?</p> <p>18 A. It has concluded.</p> <p>19 Q. Okay. So it's over?</p> <p>20 A. Yes, ma'am.</p> <p>21 Q. Okay. And were you -- were you the</p> <p>22 plaintiff in that case; so you brought the lawsuit?</p> <p>23 Or what -- did somebody else bring the lawsuit?</p> <p>24 A. Am I the plaintiff in this case?</p> <p>25 Q. Yes.</p>	<p>1 BY MS. RICHENS:</p> <p>2 Q. Okay. All right. Have you ever -- have</p> <p>3 you ever been the plaintiff in any other lawsuits?</p> <p>4 In other words, have you ever sued</p> <p>5 anybody other than Stone Mountain Inn & Suites and</p> <p>6 this case that we're in about to -- here for today?</p> <p>7 A. No, ma'am.</p> <p>8 Q. Okay. So I am glad you've given a</p> <p>9 deposition before so you probably know kind of how it</p> <p>10 works. But just to go over some -- some ground rules</p> <p>11 that I'm going to ask us to follow today, of course,</p> <p>12 I'll be asking you questions, and you have just</p> <p>13 raised your right hand and you will be -- you have</p> <p>14 sworn under oath to answer truthfully.</p> <p>15 As we have just talked about, if you will</p> <p>16 give a -- a verbal response so that Mr. Tomko can --</p> <p>17 can accurately transcribe what you're saying rather</p> <p>18 than just shaking your head or saying "uh-huh."</p> <p>19 If I ask you a question and you don't</p> <p>20 understand it or you need me to repeat it, just let</p> <p>21 me know. You know, I want you to understand what I'm</p> <p>22 asking you before you give an answer.</p> <p>23 Okay?</p> <p>24 A. Right.</p> <p>25 Q. And finally, we'll take regular breaks.</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 14..17**

Page 14	Page 16
<p>1 But if you need a break for any reason other than,</p> <p>2 you know, those regular breaks, just let me know and</p> <p>3 we'll just make sure that there's not a question</p> <p>4 pending. If there's a question out there, answer the</p> <p>5 question, and then we can take a break.</p> <p>6 Okay?</p> <p>7 A. Okay.</p> <p>8 Q. All right. So we'll go slowly so this</p> <p>9 should be -- be pretty straightforward.</p> <p>10 So, Ms. Grimes, where do you presently</p> <p>11 live? What's your residence address?</p> <p>12 A. 230 Bill Kennedy Way Southeast, Atlanta,</p> <p>13 Georgia 30316.</p> <p>14 Q. And how old are you?</p> <p>15 A. I just turned 21.</p> <p>16 Q. And what is your birthday, please?</p> <p>17 A. January 28th, 2002.</p> <p>18 Q. So you really did just turn 20 -- 21?</p> <p>19 A. Yes, ma'am.</p> <p>20 Q. Well, happy birthday.</p> <p>21 A. Thank you.</p> <p>22 Q. And where were you -- where were you</p> <p>23 born?</p> <p>24 A. In Decatur, Georgia. So DeKalb County.</p> <p>25 Q. Okay. And where did you grow up? Did</p>	<p>1 Q. Okay. How many -- how many siblings?</p> <p>2 How many brothers and sisters do you have?</p> <p>3 A. I have four brothers and one sister.</p> <p>4 Q. And where do they live now?</p> <p>5 A. Well, my older brother is dead. My</p> <p>6 little sister stays with my cousin and then two of my</p> <p>7 little brothers stay with their dad, and the</p> <p>8 youngest, he stays with his grandmother.</p> <p>9 Q. Is that all in the Atlanta area?</p> <p>10 A. No.</p> <p>11 Q. Okay.</p> <p>12 A. But it is all in Georgia, though.</p> <p>13 Q. Okay. And do you have any children?</p> <p>14 A. Yes, ma'am.</p> <p>15 Q. Okay. You have a daughter, I believe</p> <p>16 I --</p> <p>17 A. Yes, ma'am.</p> <p>18 Q. Okay. And what is her name?</p> <p>19 A. Londyn Grimes.</p> <p>20 Q. And that's L-O-N-D-Y-N?</p> <p>21 A. Yes, ma'am.</p> <p>22 Q. And how old is Londyn?</p> <p>23 A. She just turned five.</p> <p>24 Q. What is her birthday?</p> <p>25 A. February 1st.</p>
Page 15	Page 17
<p>1 you grow up in -- in DeKalb County?</p> <p>2 A. Yes. Before I moved in with my aunt, and</p> <p>3 then I grew up in Conyers, Georgia.</p> <p>4 Q. Okay. And what is your aunt's name?</p> <p>5 A. Claudette Grimes.</p> <p>6 Q. And she lives in Conyers?</p> <p>7 A. Covington now. Covington, Georgia.</p> <p>8 Q. Okay. So did you -- when you lived with</p> <p>9 her, did you live in Conyers?</p> <p>10 A. Yes, ma'am.</p> <p>11 Q. Okay. And how old were you when you</p> <p>12 moved in with your aunt?</p> <p>13 A. I was eight.</p> <p>14 Q. And before that, who did you live with?</p> <p>15 A. My mom.</p> <p>16 Q. Okay. And what's your mom's name?</p> <p>17 A. Lashanda Spencer.</p> <p>18 Q. Okay. When -- would you spell her first</p> <p>19 name, please?</p> <p>20 A. L-A-S-H-A-N-D-A, Spencer, S-P-E-N-C-E-R.</p> <p>21 Q. Okay. Great.</p> <p>22 And did you live with anyone else when</p> <p>23 you were living with your mom?</p> <p>24 A. Yeah. Like, cousins and I had other</p> <p>25 siblings as well.</p>	<p>1 Q. So she literally just turned five?</p> <p>2 A. She just turned five too, yes.</p> <p>3 Q. Okay. Well, happy birthday to her too.</p> <p>4 A. Thank you.</p> <p>5 Q. And so she was -- what year was she born?</p> <p>6 A. 2018.</p> <p>7 Q. 2018.</p> <p>8 Okay. And so how old were you when you</p> <p>9 had Londyn?</p> <p>10 A. I had just turned 16.</p> <p>11 Q. And who is Londyn's father? His -- her</p> <p>12 biological father?</p> <p>13 A. Like his name?</p> <p>14 Q. Yes.</p> <p>15 A. Ibrahim Mahdi.</p> <p>16 Q. What's the last name?</p> <p>17 A. Mahdi, M-A-H-D-I.</p> <p>18 Q. Okay. Is Mr. Mahdi someone you were in a</p> <p>19 relationship with when you -- when you conceived</p> <p>20 Londyn?</p> <p>21 A. Yes, ma'am.</p> <p>22 Q. Okay.</p> <p>23 A. Yes, ma'am.</p> <p>24 Q. Okay. All right. And does Londyn</p> <p>25 currently live with you?</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 18..21**

Page 18	Page 20
<p>1 A. No. She currently stays with my aunt.</p> <p>2 Q. Okay. So, Ms. Grimes, in the lawsuit</p> <p>3 that brings us here today, you have -- I'm going to</p> <p>4 call my client United Inn.</p> <p>5 Okay?</p> <p>6 You have sued United Inn concerning</p> <p>7 allegations that you were trafficked for sex at</p> <p>8 United Inn; is that correct?</p> <p>9 A. Correct.</p> <p>10 Q. Okay. And just to confirm what I -- what</p> <p>11 I think is the case, your lawsuit involving Stone</p> <p>12 Mountain Inn & Suites, did you, in that lawsuit,</p> <p>13 contend that you were trafficked for sex at Stone</p> <p>14 Mountain Inn & Suites?</p> <p>15 A. Yes, ma'am.</p> <p>16 Q. Okay. Is there anyplace else, other than</p> <p>17 United Inn and Stone Mountain Inn, where you have</p> <p>18 been trafficked for sex?</p> <p>19 A. No, ma'am. I mean, it was another hotel,</p> <p>20 but I can't think of the name of the hotel because it</p> <p>21 was a day -- it was like one day.</p> <p>22 Q. One day?</p> <p>23 A. Yes, ma'am.</p> <p>24 Q. Any others?</p> <p>25 A. No, ma'am.</p>	<p>1 A. Yes, ma'am.</p> <p>2 Q. All right. Can you tell me when is the</p> <p>3 first time you were traffic- -- trafficked at United</p> <p>4 Inn?</p> <p>5 A. An exact date?</p> <p>6 Q. If you know it.</p> <p>7 A. It was like October 7th or the 8th.</p> <p>8 Q. Of what year?</p> <p>9 A. 2018.</p> <p>10 Q. Had you been trafficked anywhere before</p> <p>11 you were trafficked at United Inn?</p> <p>12 A. The Stone Mountain Inn.</p> <p>13 Q. Okay. So where -- let me back up, then.</p> <p>14 Where is the first place you were -- you</p> <p>15 were trafficked?</p> <p>16 A. The Stone Mountain Inn.</p> <p>17 Q. Okay. And when was that?</p> <p>18 A. 2018 as well.</p> <p>19 Q. Okay. Do you know approximately a date</p> <p>20 or a month?</p> <p>21 A. Like a couple of months beforehand,</p> <p>22 like -- but I'm not sure of the exact.</p> <p>23 Q. A couple months before the October of</p> <p>24 2018?</p> <p>25 A. Yes. Really maybe like the month before</p>
Page 19	Page 21
<p>1 Q. Okay. The one other hotel that you --</p> <p>2 you are saying you can't remember the name of it; is</p> <p>3 that right?</p> <p>4 A. Yes, ma'am.</p> <p>5 Q. Okay. Do you know where that hotel is</p> <p>6 located?</p> <p>7 A. Yes, ma'am. It was on Memorial Drive as</p> <p>8 well.</p> <p>9 Q. Okay. If you drove by it, would you</p> <p>10 recognize it?</p> <p>11 A. Yes, ma'am.</p> <p>12 Q. Okay. Do you know how far it is from the</p> <p>13 United Inn?</p> <p>14 A. It's on the same strip. It's just --</p> <p>15 sorry.</p> <p>16 Q. That's okay.</p> <p>17 A. It's on the same strip. It's just like</p> <p>18 further up, like, the street, if that makes sense.</p> <p>19 Q. Okay. Is it on the same side of the</p> <p>20 street?</p> <p>21 A. Yes, ma'am.</p> <p>22 Q. Okay. Now, Ms. Grimes, I want to ask you</p> <p>23 about how it came to be that you were trafficked at</p> <p>24 the United Inn.</p> <p>25 Okay?</p>	<p>1 actually so --</p> <p>2 Q. Okay.</p> <p>3 A. -- August. July, August, September,</p> <p>4 October.</p> <p>5 Q. Okay.</p> <p>6 A. Yeah, the month before.</p> <p>7 THE REPORTER: The month before you</p> <p>8 said?</p> <p>9 THE WITNESS: Yes, sir.</p> <p>10 THE REPORTER: Okay. Thank you.</p> <p>11 MS. RICHENS: Yeah, speak up just --</p> <p>12 THE WITNESS: Can you not hear me?</p> <p>13 MS. RICHENS: No, he -- I can't hear</p> <p>14 you very well -- I mean, I can hear you</p> <p>15 okay because I am sitting pretty close to</p> <p>16 you, but he's -- he's probably having more</p> <p>17 trouble hearing you.</p> <p>18 So if you don't mind speaking up and</p> <p>19 he's not -- he's not picking up the</p> <p>20 microphone. That's just for the record.</p> <p>21 So...</p> <p>22 THE WITNESS: Okay.</p> <p>23 BY MS. RICHENS:</p> <p>24 Q. All right. So in the -- all right.</p> <p>25 So Stone Mountain Inn is the first place</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 22..25**

Page 22	Page 24
<p>1 you were trafficked; right?</p> <p>2 A. (Witness indicating.)</p> <p>3 Q. How did that happen? Like, how -- where</p> <p>4 were you living at that time?</p> <p>5 A. I was staying in Conyers with my auntie,</p> <p>6 and I had met a man and, you know, thought we were in</p> <p>7 a relationship or whatever, and that's how that</p> <p>8 happened.</p> <p>9 Q. Okay. And when did you meet this man?</p> <p>10 A. Like, in August or September of 2018.</p> <p>11 Q. Okay. And what is this man's name?</p> <p>12 A. Shaq. Shaq.</p> <p>13 Q. Shaq?</p> <p>14 A. Uh-huh.</p> <p>15 Q. Like S-H-A-Q, Shaq?</p> <p>16 A. Uh-huh.</p> <p>17 Q. Is that a nickname, or is that his real</p> <p>18 name?</p> <p>19 A. That's his name.</p> <p>20 Q. Do you know his last name?</p> <p>21 A. No, ma'am.</p> <p>22 Q. Okay. And where did you meet Shaq?</p> <p>23 A. Through Instagram.</p> <p>24 Q. Okay. And so you met Shaq, and you</p> <p>25 thought you were in a relationship with him.</p>	<p>1 A. I can't recall the exact time, but it is</p> <p>2 in documents, though. There's police records about</p> <p>3 it, but I can't recall the exact date right now.</p> <p>4 Q. Okay. Was it -- I mean, was it a day?</p> <p>5 Or was it days? Weeks?</p> <p>6 A. No, it was like weeks. It was weeks.</p> <p>7 Q. Okay. The -- the third hotel that you</p> <p>8 said you were trafficked at, at some point on</p> <p>9 Memorial Drive, not United Inn. I'm talking -- you</p> <p>10 know the one I'm talking about where you don't</p> <p>11 remember the name?</p> <p>12 A. Yes, ma'am.</p> <p>13 Q. When were you trafficked there?</p> <p>14 A. The same -- we had ended up leaving the</p> <p>15 United Inn, and when we left the United Inn, I had</p> <p>16 went -- I was still with someone else, and we had</p> <p>17 went to the other hotel, and that was that.</p> <p>18 Q. So the third hotel was after the United</p> <p>19 Inn?</p> <p>20 A. Correct.</p> <p>21 Q. Okay. So -- so we have determined that</p> <p>22 you were first trafficked at -- excuse me.</p> <p>23 At the United Inn on -- you said</p> <p>24 October 7th or 8th of 2018; correct?</p> <p>25 A. Correct.</p>
Page 23	Page 25
<p>1 And then how did that become you were</p> <p>2 being trafficked at Stone Mountain Inn?</p> <p>3 A. Could you reask your question?</p> <p>4 Q. Sure.</p> <p>5 How did it go from you were in a</p> <p>6 relationship with Shaq to you were being trafficked</p> <p>7 at Stone Mountain?</p> <p>8 A. Yeah. Like, I thought -- I thought me</p> <p>9 and Shaq were in a relationship, yes, and he had me</p> <p>10 working for him. And that's exactly what that was.</p> <p>11 He just had me working for him, but I'm thinking it</p> <p>12 was something, you know. I just thought we were in a</p> <p>13 relationship, but that wasn't that. Like, I can't --</p> <p>14 That's how it happened. I thought we</p> <p>15 were in a relationship, and he had me working for</p> <p>16 him.</p> <p>17 Q. Okay.</p> <p>18 A. That's how it happened.</p> <p>19 Q. Okay. That's what I thought I heard you</p> <p>20 say.</p> <p>21 Okay. So when you were -- when you were</p> <p>22 trafficked at the Stone Mountain Inn, how long were</p> <p>23 you there? And we're talking about this first time</p> <p>24 in July of -- July, August, somewhere in there of</p> <p>25 2018.</p>	<p>1 Q. And -- and how did -- how did you end up</p> <p>2 there?</p> <p>3 A. At the United Inn?</p> <p>4 Q. Yes.</p> <p>5 A. Through -- through this girl named Kevy</p> <p>6 that I had met through Shaq.</p> <p>7 Q. Okay. How do you spell Kevy?</p> <p>8 A. K-E-V-I-I (sic). K-E-E-V-I (sic).</p> <p>9 Q. Okay. Something like that?</p> <p>10 A. Yes, ma'am.</p> <p>11 Q. You met her through Shaq?</p> <p>12 A. Correct.</p> <p>13 Q. Okay. And what happened? How did you</p> <p>14 end up at the United Inn?</p> <p>15 A. We went to the United Inn.</p> <p>16 Q. Okay. For -- for what purpose?</p> <p>17 A. To work for Shaq.</p> <p>18 Q. Okay. And do you -- do you know why</p> <p>19 during this time period you were being trafficked at</p> <p>20 the United Inn instead of Stone Mountain Inn?</p> <p>21 A. (Witness unresponsive.)</p> <p>22 Q. Let me ask you a different question.</p> <p>23 So you -- you told me, I believe that you</p> <p>24 had -- you were previously trafficked by Shaq at the</p> <p>25 Stone Mountain Inn; right?</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 26..29**

Page 26	Page 28
<p>1 A. Correct.</p> <p>2 Q. Then in October, you were trafficked by</p> <p>3 Shaq at the United Inn; correct?</p> <p>4 A. Well, no, it wasn't --</p> <p>5 Q. So is that right, or did I --</p> <p>6 A. No. I wasn't trafficked by Shaq at the</p> <p>7 United Inn. It was two other men. But my first time</p> <p>8 going to the United Inn, it was through somebody I</p> <p>9 met through Shaq. That's how I ended up there.</p> <p>10 Q. Okay.</p> <p>11 A. And we were working for Shaq, but he</p> <p>12 wasn't my actual trafficker at the United Inn.</p> <p>13 Q. Okay. When you say you -- you were</p> <p>14 working for Shaq, what does that mean?</p> <p>15 A. Making money for him.</p> <p>16 Q. Okay. But -- so I thought you -- I</p> <p>17 thought I just heard you say when you got -- when you</p> <p>18 first went to the United Inn, you were working for</p> <p>19 Shaq, but you weren't being trafficked by him; is</p> <p>20 that right?</p> <p>21 Is that what you said?</p> <p>22 A. No, that's not what I said.</p> <p>23 Q. Okay. I'm sorry.</p> <p>24 A. I said -- I said Shaq wasn't my two</p> <p>25 traffickers, because you're trying to say, like, Shaq</p>	<p>1 Q. Okay. Now, what are the names of the two</p> <p>2 men that you said you were trafficked by at United</p> <p>3 Inn?</p> <p>4 A. Cash and King.</p> <p>5 Q. Cash?</p> <p>6 A. Uh-huh.</p> <p>7 Q. C-A-S-H.</p> <p>8 And King --</p> <p>9 A. Uh-huh.</p> <p>10 Q. -- K-I-N-G?</p> <p>11 A. K-I-N-G.</p> <p>12 Q. Okay. Okay. You don't know their real</p> <p>13 names, or do you?</p> <p>14 A. One of their names is in the police</p> <p>15 report as well, but I can't think of it by heart.</p> <p>16 And the other one, I just never got his real name.</p> <p>17 Q. Okay. Which one -- if you know, which</p> <p>18 one's real name is in the police report?</p> <p>19 A. Cash.</p> <p>20 Q. Okay. All right.</p> <p>21 And -- and so you met Cash and King</p> <p>22 though Kevy?</p> <p>23 A. No. So I met them around the -- at the</p> <p>24 hotel. So Kevy -- the same day that Kevy had took me</p> <p>25 to the hotel, she had ended up leaving for something.</p>
Page 27	Page 29
<p>1 was my trafficker at the United Inn.</p> <p>2 Q. Okay.</p> <p>3 A. He wasn't. It was two other men.</p> <p>4 Q. Okay.</p> <p>5 A. But my first time going, it was to make</p> <p>6 money for Shaq, but Shaq wasn't with us at the time.</p> <p>7 Shaq had just got locked up.</p> <p>8 Q. Okay.</p> <p>9 A. That's why this girl had came on his</p> <p>10 behalf.</p> <p>11 Q. Okay.</p> <p>12 A. But he wasn't present, you -- if that</p> <p>13 makes sense, because he was locked up.</p> <p>14 Q. It does make sense. It does make sense.</p> <p>15 A. So...</p> <p>16 Q. Thank you.</p> <p>17 A. Yes, ma'am.</p> <p>18 Q. Okay. Now, so was it -- was it Kevy who</p> <p>19 took you to the United Inn?</p> <p>20 A. Yes, ma'am.</p> <p>21 Q. Okay. You didn't choose the United Inn?</p> <p>22 A. No, ma'am.</p> <p>23 Q. Okay. Were you ever at the United Inn</p> <p>24 for anything other than trafficking?</p> <p>25 A. No, ma'am.</p>	<p>1 Something had happened, and she left, and she didn't</p> <p>2 come back, and I was still at the room. They left me</p> <p>3 at the room.</p> <p>4 So the next day, the following day,</p> <p>5 they're -- you know, like, it's time to check out the</p> <p>6 room. I didn't have nowhere to go at the time, so</p> <p>7 I'm trying to get in contact with the girl who</p> <p>8 dropped me off, and I had ended up meeting King.</p> <p>9 That's when I had met King at the hotel.</p> <p>10 Q. So you met Cash and King at the hotel?</p> <p>11 A. Correct.</p> <p>12 Q. And you went to the hotel to be sex</p> <p>13 trafficked; is that --</p> <p>14 A. No.</p> <p>15 Q. Okay. Why did you go to the hotel?</p> <p>16 A. Because Kevy said Shaq wanted us to go to</p> <p>17 the hotel, so I am listening to what they're saying.</p> <p>18 Q. Okay. But did you understand that's why</p> <p>19 you would be going there?</p> <p>20 A. Yeah, to work for Shaq. I knew we were</p> <p>21 about to make money for Shaq, yes, ma'am.</p> <p>22 Q. Okay. Okay. So tell me about the</p> <p>23 first -- this first visit to the United Inn, you said</p> <p>24 it was October 7th or 8th; right?</p> <p>25 A. Correct.</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 30..33**

Page 30	Page 32
<p>1 Q. How -- how long were you there?</p> <p>2 A. For like five weeks.</p> <p>3 Q. Five weeks?</p> <p>4 A. Yes, ma'am.</p> <p>5 Q. Okay. Starting October 7th or 8th?</p> <p>6 A. Correct.</p> <p>7 Q. During those five weeks, did you ever</p> <p>8 leave the property?</p> <p>9 A. As in like live somewhere else, or just</p> <p>10 like leave to go do something or something?</p> <p>11 Q. Okay. That's a great question.</p> <p>12 During those five weeks, did you ever</p> <p>13 leave for any purpose other than just to run an</p> <p>14 errand or something like that?</p> <p>15 A. Yeah. Like, to go get food or go to</p> <p>16 the -- it was like a gas station right across the</p> <p>17 street, just, like, stuff like that, yes.</p> <p>18 Q. During those five weeks, did you ever</p> <p>19 spend the night somewhere else?</p> <p>20 A. No, I didn't.</p> <p>21 Q. Okay. And during those five weeks,</p> <p>22 Ms. Grimes, were you -- were you -- you were being</p> <p>23 trafficked at the United Inn?</p> <p>24 A. Yes, ma'am.</p> <p>25 Q. And during those five weeks, were you in</p>	<p>1 A. No, I actually don't. I never seen King</p> <p>2 rent, like, the room. He already -- when I met him,</p> <p>3 he already had his rooms so he never, like, went to</p> <p>4 rent another room. He was just already paying for</p> <p>5 the rooms that he was having.</p> <p>6 And then with Cash, I personally went</p> <p>7 with Cash to go rent rooms, but I'm not sure if they</p> <p>8 were in his name. But he was the one renting them,</p> <p>9 yes.</p> <p>10 Q. When you -- when you arrived at the</p> <p>11 United Inn, Ms. Grimes, did you understand that you</p> <p>12 were -- that -- did you have any idea you were going</p> <p>13 to be there for weeks at a time being sex trafficked?</p> <p>14 A. No, I didn't.</p> <p>15 Q. Okay. What -- what was your</p> <p>16 understanding of what you were going to be doing</p> <p>17 there?</p> <p>18 A. Making money for Shaq.</p> <p>19 Q. What do you mean by that?</p> <p>20 A. What do you mean what do I mean?</p> <p>21 Q. Having sex for money, but the money would</p> <p>22 be going to Shaq?</p> <p>23 A. Yeah, basically. I guess, like, we --</p> <p>24 Shaq said make the money so that's what we went to go</p> <p>25 do.</p>
Page 31	Page 33
<p>1 the same room the whole time?</p> <p>2 A. No, ma'am.</p> <p>3 Q. Okay.</p> <p>4 A. It was different rooms.</p> <p>5 Q. Okay. During that five-week period, do</p> <p>6 you know how many different rooms you were in?</p> <p>7 A. I would say about five different rooms as</p> <p>8 well.</p> <p>9 Q. Okay. And do you know why you moved from</p> <p>10 room to room?</p> <p>11 A. No. When I was with King, he had a set</p> <p>12 room. Like, that was the room, but he also had an</p> <p>13 extra room to work out of too. So King had two rooms</p> <p>14 and then -- well, really King -- well -- it bothered</p> <p>15 me -- King had two rooms.</p> <p>16 And then Cash -- like if -- they'll check</p> <p>17 out because sometimes they did use to check out and</p> <p>18 then, like, pay for another room because they didn't</p> <p>19 want the room, so it will be like that. Like, we're</p> <p>20 switching rooms because they didn't want the room,</p> <p>21 like...</p> <p>22 Q. Okay. Do you know -- you have referenced</p> <p>23 a little bit, but do you know who -- whose names the</p> <p>24 rooms were reserved in that you -- where you were</p> <p>25 trafficked?</p>	<p>1 Q. And that's what that means?</p> <p>2 A. Is what what?</p> <p>3 Q. Yeah, I am not trying to confuse you. I</p> <p>4 have just -- you -- you have used this term "make</p> <p>5 money" for Shaq several times.</p> <p>6 A. Like, working, yes, ma'am.</p> <p>7 Q. Like, having sex for money, or do you</p> <p>8 mean something else?</p> <p>9 A. I mean -- yes, ma'am.</p> <p>10 Q. Okay. Okay. And I'm not trying to -- if</p> <p>11 you don't understand my question or anything, I am</p> <p>12 not trying to put words in your mouth; I am just --</p> <p>13 and I hope you understand that. I'm just trying to</p> <p>14 make sure I understand what you're talking about.</p> <p>15 Okay?</p> <p>16 A. Right.</p> <p>17 Q. Okay. All right. So we talked about</p> <p>18 this five-week period when you were at the United</p> <p>19 Inn.</p> <p>20 When -- so you would have -- when you</p> <p>21 left the United Inn, then it would have been sometime</p> <p>22 in November of 2018, if we count about five weeks.</p> <p>23 A. (Witness indicating.)</p> <p>24 Q. Is that about right?</p> <p>25 A. Yes, ma'am. Oh, no, I'm -- yes, ma'am --</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 34..37**

Page 34	Page 36
<p>1 no, it was November of 2018, like, middle/end of</p> <p>2 November.</p> <p>3 Q. Okay. All right. And what happened that</p> <p>4 caused you to leave?</p> <p>5 A. Cash had got arrested.</p> <p>6 Q. Okay. And so you -- you just left the</p> <p>7 hotel?</p> <p>8 A. So since we didn't get arrested, but we</p> <p>9 were all in the room, by law they had to serve us,</p> <p>10 like, the trespassing paper. So after we signed the</p> <p>11 paper, we had left.</p> <p>12 Q. All right. And where did you -- where</p> <p>13 did you go after that?</p> <p>14 A. I really don't remember exactly. It was</p> <p>15 on Memorial Drive, though. It was where Cash had</p> <p>16 told us to go. Like, he had -- he already knew he</p> <p>17 was about to get locked up so -- and he told us,</p> <p>18 like, where to go, like, once he got locked up.</p> <p>19 So...</p> <p>20 Q. And was this -- was this that third hotel</p> <p>21 we talked about before, or is it another place?</p> <p>22 A. It's the third hotel, and he sent us to</p> <p>23 somebody so we went to go, like, stay with them for</p> <p>24 that night.</p> <p>25 Q. Were you trafficked at that other place</p>	<p>1 A. We had got a ride to United -- this boy</p> <p>2 named Kimani had took us, and he -- he got us --</p> <p>3 Q. I'm sorry. He took you; is that what you</p> <p>4 said?</p> <p>5 A. Yes, ma'am.</p> <p>6 Q. Okay.</p> <p>7 A. I was with someone else. It was me and</p> <p>8 some other girls. This boy Kimani had took us to the</p> <p>9 United Inn and got us a room at the United Inn. And</p> <p>10 we were there -- I wasn't there that long. It's -- I</p> <p>11 was the first time. We were there for like three</p> <p>12 days, maybe even less. Maybe -- well, like, yeah,</p> <p>13 like, two or three days.</p> <p>14 Q. Two to three days.</p> <p>15 Okay. And who were you -- who were</p> <p>16 you -- who were you working for during those two to</p> <p>17 three days?</p> <p>18 A. King.</p> <p>19 Q. King.</p> <p>20 And during the first day, you were -- in</p> <p>21 October/November, you were working for Cash and King</p> <p>22 or just --</p> <p>23 A. No, I'm sorry. Could you repeat it? The</p> <p>24 first --</p> <p>25 Q. Sure. So -- sure.</p>
Page 35	Page 37
<p>1 that you're talking about?</p> <p>2 A. Yes, ma'am. I mean, you can say that.</p> <p>3 It was for a night, but you could -- yes, ma'am.</p> <p>4 Q. Okay. And again, this is the third hotel</p> <p>5 that's also on Memorial Drive that we talked about</p> <p>6 before?</p> <p>7 A. Correct.</p> <p>8 Q. Okay. And you were only there for a</p> <p>9 night?</p> <p>10 A. Yes, ma'am.</p> <p>11 Q. Okay. Who -- who was with you at that</p> <p>12 hotel?</p> <p>13 A. Cash's girl. It was kind of like his</p> <p>14 girlfriend, I guess you could say. But she was</p> <p>15 through Cash. A girl Cash had with him.</p> <p>16 Q. Okay. When -- when is the next -- was</p> <p>17 there another time that you were back at the United</p> <p>18 Inn & Suites?</p> <p>19 A. Yes, ma'am.</p> <p>20 Q. Okay. When was that?</p> <p>21 A. In January.</p> <p>22 Q. January of 2019?</p> <p>23 A. Correct.</p> <p>24 Q. All right. Okay. And how did you end up</p> <p>25 back at the United Inn?</p>	<p>1 So the first time you were at the United</p> <p>2 Inn in October and November --</p> <p>3 A. Yes, ma'am.</p> <p>4 Q. -- you were working for Cash and King; is</p> <p>5 that right?</p> <p>6 A. Yes, ma'am. Not at the same time,</p> <p>7 though, but in that span of time, yes, ma'am.</p> <p>8 Q. Right.</p> <p>9 Okay. So for part of the time, you were</p> <p>10 working for Cash; and then part of the time, you were</p> <p>11 working for King?</p> <p>12 A. Correct.</p> <p>13 Q. Okay. And then when you were back at the</p> <p>14 United Inn in January for a couple -- two to three</p> <p>15 days, you were working for King; is that right or?</p> <p>16 A. Correct.</p> <p>17 Q. Okay. And during that period of time,</p> <p>18 were you -- were you in the same room for those two</p> <p>19 to three days?</p> <p>20 A. Yes, ma'am.</p> <p>21 Q. Okay. Okay. And what happened that</p> <p>22 caused you to leave the hotel in January of 2019?</p> <p>23 A. (Witness unresponsive.)</p> <p>24 Q. Let me ask a different question.</p> <p>25 What happened that caused you to leave</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 38..41**

Page 38	Page 40
<p>1 the United Inn in January of 2019 after you had been</p> <p>2 there for two to three days? Why did you leave?</p> <p>3 A. I honestly don't even remember.</p> <p>4 Q. Okay.</p> <p>5 A. But I just know we all had left.</p> <p>6 Q. Okay. When you say "all" -- "we all had</p> <p>7 left," who are you talking about?</p> <p>8 A. I had first went to the United Inn with</p> <p>9 like three girls. We were, like, three other girls.</p> <p>10 The January time, not the first time, but the January</p> <p>11 time when I had went.</p> <p>12 Q. Okay. And what are their names?</p> <p>13 A. I actually don't remember. We were in</p> <p>14 group homes together, though.</p> <p>15 Q. Okay. So these three -- so these three</p> <p>16 girls that you went -- you're saying you went to the</p> <p>17 United Inn with them in the January time period;</p> <p>18 right?</p> <p>19 A. Correct.</p> <p>20 Q. And there are three girls you knew from</p> <p>21 group homes?</p> <p>22 A. Yeah. We -- we were in a group home</p> <p>23 together.</p> <p>24 Q. Okay. Tell me when you were in a -- tell</p> <p>25 me about the group home that you're talking about.</p>	<p>1 you left the United Inn in 20- -- January of 2019,</p> <p>2 and I think you said you didn't remember.</p> <p>3 A. Yeah, I don't recall.</p> <p>4 Q. Okay. Did you ever return to the United</p> <p>5 Inn?</p> <p>6 A. Again, after that?</p> <p>7 Q. Yes, ma'am.</p> <p>8 A. No, ma'am.</p> <p>9 Q. Okay. So there were just two -- two time</p> <p>10 periods you were at the United Inn, if I am --</p> <p>11 A. Correct.</p> <p>12 Q. Okay. One was in October or November of</p> <p>13 2018, and the other was in January of 2019?</p> <p>14 A. January; correct.</p> <p>15 Q. Okay.</p> <p>16 A. Could we take a break, though? Like, can</p> <p>17 I go to the restroom?</p> <p>18 MS. RICHENS: Absolutely.</p> <p>19 MR. BOUCHARD: Yes.</p> <p>20 MS. RICHENS: Absolutely. Take your</p> <p>21 microphone off so you don't pull it.</p> <p>22 THE VIDEOGRAPHER: Stand by.</p> <p>23 The time is 10:43 a.m. This is the</p> <p>24 end of Media No. 1, and we are off the</p> <p>25 record.</p>
Page 39	Page 41
<p>1 When were you in a group home?</p> <p>2 A. Like, from 2018 all the way to, like,</p> <p>3 20- -- from 2018 to 2020, I was in group homes.</p> <p>4 Q. How did you end up in a group home</p> <p>5 initially?</p> <p>6 A. Initially?</p> <p>7 Q. Yeah.</p> <p>8 A. My auntie wasn't fit to care for me at</p> <p>9 the time, and then I just had a child as well. It</p> <p>10 was just a lot going on at the time.</p> <p>11 Q. Okay. So when -- when would it have been</p> <p>12 that you first moved into a group home?</p> <p>13 A. I'm not sure, but sometime in 2018.</p> <p>14 Q. Okay. Was it before these incidents of</p> <p>15 sex trafficking that we're talking about?</p> <p>16 A. No. It was actually after the incident</p> <p>17 of sex trafficking, yeah.</p> <p>18 Q. Okay.</p> <p>19 A. Yeah.</p> <p>20 Q. So when you -- when you were first</p> <p>21 trafficked at Stone -- Stone Mountain Inn & Suites,</p> <p>22 you were still living with your -- your auntie?</p> <p>23 A. The very first time; correct.</p> <p>24 Q. Okay. All right. Okay. And so we</p> <p>25 were -- we were talking about where you went after</p>	<p>1 (Whereupon, the video camera was</p> <p>2 turned off.)</p> <p>3 (A short recess was taken.)</p> <p>4 (Whereupon, the video camera was</p> <p>5 turned on.)</p> <p>6 THE VIDEOGRAPHER: This is the</p> <p>7 beginning of Media No. 2. The time is</p> <p>8 10:55 a.m.</p> <p>9 We are on the record.</p> <p>10 BY MS. RICHENS:</p> <p>11 Q. All right. Ms. Grimes, so we took a</p> <p>12 little break, and we're -- we're back on the record</p> <p>13 now.</p> <p>14 So thank you for helping me walk through</p> <p>15 some of the chronology that we talked about before,</p> <p>16 and I'm -- as you might imagine, I'm really going to</p> <p>17 be focusing on the time at the United Inn since</p> <p>18 that's who I am representing.</p> <p>19 So you told me that you -- before you --</p> <p>20 before you wound up at the United Inn in October of</p> <p>21 2018, you had previously been at the Stone Mountain</p> <p>22 Inn; is that right?</p> <p>23 A. Correct.</p> <p>24 Q. Did you go directly from one to the</p> <p>25 other, or did you -- you know, go back to a group</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 42..45**

Page 42	Page 44
<p>1 home? Or what did -- how -- how did that work, if</p> <p>2 you know what I'm asking?</p> <p>3 A. No. I had went to -- I went to a CSEC</p> <p>4 home actually, and then I ended up going back, yeah,</p> <p>5 to -- well, not back, but to the United Inn</p> <p>6 afterwards.</p> <p>7 Q. Okay. And I didn't hear what you said.</p> <p>8 What kind of home?</p> <p>9 A. A CSEC home.</p> <p>10 Q. What is that?</p> <p>11 A. A house for like girls who are being</p> <p>12 sexually abused or sex trafficked or anything like</p> <p>13 that.</p> <p>14 THE VIDEOGRAPHER: Ms. Kerns, do you</p> <p>15 mind speaking up?</p> <p>16 I'm having a hard time hearing you.</p> <p>17 Sorry about that.</p> <p>18 THE WITNESS: I'm sorry. It's my</p> <p>19 throat.</p> <p>20 Can I -- can I get a cough drop?</p> <p>21 MR. BOUCHARD: Of course.</p> <p>22 THE WITNESS: Sorry.</p> <p>23 BY MS. RICHENS:</p> <p>24 Q. No, that's all right.</p> <p>25 So you were at a CSEC home, and you --</p>	<p>1 He picked you -- he picked you up and you think two</p> <p>2 other girls from the group home?</p> <p>3 A. Uh-huh.</p> <p>4 MR. BOUCHARD: What time frame are we</p> <p>5 talking about?</p> <p>6 BY MS. RICHENS:</p> <p>7 Q. We're talking October of 2018; is that</p> <p>8 right?</p> <p>9 We're --</p> <p>10 A. Correct.</p> <p>11 Q. And you -- you don't know the names of</p> <p>12 the other two girls?</p> <p>13 A. No. It, like, slipped my mind, but if I</p> <p>14 hear it, I will know that's their name.</p> <p>15 Q. Okay. All right. And -- and so</p> <p>16 Kimani -- Kimani took you and the other two girls to</p> <p>17 the United Inn?</p> <p>18 A. Correct.</p> <p>19 Q. Right.</p> <p>20 And -- and did you understand that you</p> <p>21 were going there to be -- to be trafficked?</p> <p>22 A. No. Hold on. I'm actually talking about</p> <p>23 January. I'm sorry.</p> <p>24 Q. Okay.</p> <p>25 A. That's really embarrassing.</p>
Page 43	Page 45
<p>1 did you run away from that home and end up at the --</p> <p>2 at the United Inn, or how did you get from that home</p> <p>3 to the United Inn?</p> <p>4 A. Someone had came and got us. Kimani,</p> <p>5 this boy, had came and picked us up, me and who I was</p> <p>6 with the -- some other girls at the time, and took us</p> <p>7 to United Inn.</p> <p>8 Q. Kimani picked up you and who else?</p> <p>9 A. Two other girls I was with.</p> <p>10 Q. And what are their names?</p> <p>11 A. Oh, no, actually --</p> <p>12 Q. I'm sorry. Go ahead. And take your</p> <p>13 time. I know -- I know we've been going back and</p> <p>14 forth a little bit on the time frames. So...</p> <p>15 I'm talking about in October of 2018.</p> <p>16 A. I can't think of the name, but I'm pretty</p> <p>17 sure it's in, like, a report too as well because I</p> <p>18 haven't talked to them since 2018.</p> <p>19 Q. Okay. So who is Kimahdi (PH)? Or</p> <p>20 Kimahdi or Kimani?</p> <p>21 A. Kimani. Kimani.</p> <p>22 He is a guy that I had met prior to me</p> <p>23 being in a group home. I had met him at the Stone</p> <p>24 Mountain Inn around that time.</p> <p>25 Q. Okay. So you ended up at the United Inn.</p>	<p>1 Q. No, no, no.</p> <p>2 A. No -- okay.</p> <p>3 So October of 2018; right?</p> <p>4 Q. Yes.</p> <p>5 A. No. A girl named Kevy had took me to the</p> <p>6 United Inn.</p> <p>7 Q. Okay. And we talked about --</p> <p>8 A. Yes, ma'am.</p> <p>9 Q. -- talked Kevy before. Okay. All right.</p> <p>10 So I'm going to cross out talking about Kimani.</p> <p>11 A. Yes, ma'am.</p> <p>12 Q. We'll get to him --</p> <p>13 A. It was a lot. This one -- but no,</p> <p>14 October, it was Kevy who had took me to --</p> <p>15 Q. Okay.</p> <p>16 A. -- United Inn the first time.</p> <p>17 Q. Okay. And I think what we said before</p> <p>18 was that Kevy picked you up.</p> <p>19 A. Uh-huh.</p> <p>20 Q. You thought you were going to the United</p> <p>21 Inn to work for Shaq; is that right?</p> <p>22 A. Correct, yes, ma'am.</p> <p>23 Q. Okay. So what happened when you -- you</p> <p>24 know, October 7th or 8th of 2018, what happened when</p> <p>25 you arrived at the United Inn?</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 46..49**

Page 46	Page 48
<p>1 A. Shaq, um, he already had gave like --</p> <p>2 Kevy already had money from Shaq. Like, he gave her</p> <p>3 the money to purchase the room, so she purchased the</p> <p>4 room, and then she ended up leaving to go do</p> <p>5 something, but she, like, never came back. I'm not</p> <p>6 sure what had happened, and I was still up there.</p> <p>7 Q. And when this first happened, do you know</p> <p>8 what room this was -- this was at the hotel?</p> <p>9 A. No. I just know it was a -- we were at</p> <p>10 the very top floor, and it was a back room.</p> <p>11 Q. Top floor back room, meaning the back of</p> <p>12 the hotel?</p> <p>13 A. Yes, ma'am.</p> <p>14 Q. Okay.</p> <p>15 A. On the backside.</p> <p>16 Q. Okay. Okay. And did you understand what</p> <p>17 you were doing there?</p> <p>18 A. At the time, no. But now, yes.</p> <p>19 Q. Okay. So -- so what happened? You --</p> <p>20 you got to this -- did someone bring you to the room?</p> <p>21 A. Yeah, Kevy did.</p> <p>22 Q. Okay. All right. And then what</p> <p>23 happened? You said she left.</p> <p>24 A. Yeah. So she had left, and then the next</p> <p>25 day, it was, you know, time to check out of the room.</p>	<p>1 and I know this is hard, and I -- I feel bad because</p> <p>2 I feel like I'm grilling you with questions. So</p> <p>3 please -- you know, I know it's difficult. So you</p> <p>4 take your time, and I will -- I will, you know, be</p> <p>5 professional, and we'll get through it.</p> <p>6 Okay?</p> <p>7 A. Right.</p> <p>8 Q. So what I'm hearing you say is you didn't</p> <p>9 know King; you didn't go to the hotel with King; you</p> <p>10 literally just met King at the hotel?</p> <p>11 A. Correct.</p> <p>12 Q. Okay. Do you want a tissue or something?</p> <p>13 A. Please.</p> <p>14 Q. Yeah.</p> <p>15 So you met King at the hotel, and you had</p> <p>16 this conversation, and then what -- and then what</p> <p>17 happened?</p> <p>18 A. He had took me in the room with him,</p> <p>19 like -- and then he had, like, two other girls with</p> <p>20 him too. One was, like, his baby mama, and the other</p> <p>21 was the baby mama's sister. But, yeah, like, he seen</p> <p>22 me at the hotel, you know, started asking me, like,</p> <p>23 what was I doing out there; did I need anything; I</p> <p>24 could come sit in his room and stuff like that. So</p> <p>25 then I went in the room and -- yeah.</p>
Page 47	Page 49
<p>1 So I'm just around the hotel, trying to get a ride,</p> <p>2 figure out, you know, what I'm about to do, and then</p> <p>3 I had met King.</p> <p>4 Q. I'm sorry. You were trying to get a --</p> <p>5 A. Get, like, a ride from the hotel or</p> <p>6 something.</p> <p>7 Q. Okay.</p> <p>8 A. Because I am just at the hotel.</p> <p>9 Q. Okay.</p> <p>10 A. Like, just outside at the hotel. So I</p> <p>11 ended up meeting King.</p> <p>12 Q. You just met him at the hotel?</p> <p>13 A. I mean, he -- yeah, like, he walked up to</p> <p>14 me. I am just outside so you know. I'm sorry. I</p> <p>15 don't mean to sound mean.</p> <p>16 But he -- I'm standing outside, yes, and</p> <p>17 he had approached me and told me I could come to his</p> <p>18 room, like asked me what I needed and stuff like</p> <p>19 that.</p> <p>20 Q. I'm sorry. You weren't mean -- did --</p> <p>21 you weren't mean to me.</p> <p>22 A. Yeah. I just didn't want to come across</p> <p>23 like that because that's not how I was trying to</p> <p>24 sound.</p> <p>25 Q. Well, and I -- I didn't take it that way,</p>	<p>1 Q. Where was this room? Where was King's</p> <p>2 room?</p> <p>3 A. I'm sorry. I'm sorry. I don't know why</p> <p>4 I'm crying right now.</p> <p>5 His room -- on the front side of the</p> <p>6 hotel, on the third floor. It was on the third floor</p> <p>7 in the front side. Like, in front of like the lobby</p> <p>8 area where you would walk into the lobby of the</p> <p>9 hotel.</p> <p>10 Q. Uh-huh.</p> <p>11 A. It was on that side.</p> <p>12 Q. Left side as you're looking at the hotel?</p> <p>13 A. Yes, ma'am.</p> <p>14 Q. Okay.</p> <p>15 A. It was on the left side.</p> <p>16 Q. Do you want to take a break, or you want</p> <p>17 to keep going?</p> <p>18 A. No. I really just want to get it over</p> <p>19 with.</p> <p>20 Q. Okay. I -- I thought you might say that</p> <p>21 so we'll -- we'll keep going. But if you -- if you</p> <p>22 ever do want to just stop, let me know.</p> <p>23 Okay. And so -- and then what happened?</p> <p>24 So you went -- you went -- you went into that room,</p> <p>25 and -- and what happened?</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 50..53**

Page 50	Page 52
<p>1 A. So he had took me into the room, and like</p> <p>2 we just started to -- like, he seemed as like, you</p> <p>3 know, like, he really cared about, like, what I had</p> <p>4 going on. And, you know, like, my safety at the</p> <p>5 time, like he was trying to protect me or whatever,</p> <p>6 and yeah. I'm sorry.</p> <p>7 Do you want me to go more into detail?</p> <p>8 Q. Well, so I guess at some point you --</p> <p>9 you -- he trafficked you?</p> <p>10 A. Yes, ma'am.</p> <p>11 Q. Did that just start like that day?</p> <p>12 A. No, it wasn't the same day, actually. It</p> <p>13 was, like, maybe, like, the following day. So the</p> <p>14 first day I met him --</p> <p>15 Q. Uh-huh.</p> <p>16 A. -- he didn't do that yet. Like, he was</p> <p>17 telling me about, like, what his baby mama and the</p> <p>18 sister were doing, like, and that is what they were</p> <p>19 doing, but at the time, it -- I wasn't doing that</p> <p>20 yet. Like, he was more so talking to me, I guess.</p> <p>21 Q. Okay.</p> <p>22 A. Yeah.</p> <p>23 Q. All right. And then it sounds like maybe</p> <p>24 the next day that -- that's what happened?</p> <p>25 A. So yes, that is what happened. Later</p>	<p>1 using it like that.</p> <p>2 Q. Okay. And what -- the time we're talking</p> <p>3 about now, and it sounds like it's early October, had</p> <p>4 you met Cash yet or this was just King?</p> <p>5 A. Not yet.</p> <p>6 Q. Okay. So -- so tell me about, um, maybe</p> <p>7 the first period of time when you -- when you were</p> <p>8 being trafficked by King at the United Inn, where --</p> <p>9 where was this -- where was the room, or were you</p> <p>10 moved from room to room?</p> <p>11 A. It just -- well, he had two rooms; so one</p> <p>12 was on the front side, and that was, like, the room</p> <p>13 we, like, slept in and stuff. We were living out of</p> <p>14 that room.</p> <p>15 Q. Okay.</p> <p>16 A. So everyone was living out of that one</p> <p>17 room, and then he had a room on the backside</p> <p>18 because -- it was three girls in the rooms, and all</p> <p>19 three of us couldn't make -- you know, money at the</p> <p>20 same time in one room. So he had another room. So</p> <p>21 one girl was doing what they were doing, and the girl</p> <p>22 goes to the other room.</p> <p>23 Q. Okay. So if I heard you correctly, he</p> <p>24 had two rooms; one was in the front where you would</p> <p>25 sleep at night?</p>
Page 51	Page 53
<p>1 that night, like, he had gave me, like, these pills</p> <p>2 or whatever, and then the next day, that's kind of</p> <p>3 when everything came into play. He had took me to</p> <p>4 another room that he had because he had another room</p> <p>5 on the backside of the hotel, but it was on the same</p> <p>6 floor, and then that's kind of what he like -- told</p> <p>7 me everything, like, what I was going to be doing and</p> <p>8 stuff.</p> <p>9 Q. He told you what you were going to be</p> <p>10 doing; is that what you said?</p> <p>11 A. Yes. Like, you know, "I have an ad.</p> <p>12 You're going to post an ad. You're going to make</p> <p>13 money, you're going to do this" and stuff like that.</p> <p>14 Q. Okay. All right. And that's what</p> <p>15 happened?</p> <p>16 A. (Witness indicating.)</p> <p>17 Q. Okay. And -- and where was -- do you</p> <p>18 know where the ads were posted?</p> <p>19 A. Uh-huh.</p> <p>20 Q. Where is that?</p> <p>21 A. On ListCrawler.</p> <p>22 Q. Okay. Were you familiar with</p> <p>23 ListCrawler? Had you heard of that before?</p> <p>24 A. Yes. I have -- I have heard of it</p> <p>25 before, yes, through Shaq. But I really wasn't like</p>	<p>1 A. I mean, they were working out of that</p> <p>2 room too.</p> <p>3 Q. Okay.</p> <p>4 A. But that is the room we were sleeping out</p> <p>5 of, though, yes.</p> <p>6 Q. Okay. And the other one was more</p> <p>7 where -- where the -- the sexual activity would</p> <p>8 occur?</p> <p>9 A. I mean, both of them --</p> <p>10 Q. Okay.</p> <p>11 A. -- it was occurring in, but one was just</p> <p>12 an extra room.</p> <p>13 Q. Okay.</p> <p>14 A. You -- if that makes sense because --</p> <p>15 Q. Yeah, I understand.</p> <p>16 A. Yes, ma'am.</p> <p>17 Q. I understand.</p> <p>18 And the two other girls are the two girls</p> <p>19 you told me about before, his baby mama and somebody</p> <p>20 else, or were there --</p> <p>21 A. Uh-huh.</p> <p>22 Q. Okay. And I may have asked you this</p> <p>23 before, but now that we're going through it a little</p> <p>24 bit more step-by-step, do you know whose -- whose</p> <p>25 name these rooms were rented in?</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 54..57**

<p style="text-align: right;">Page 54</p> <p>1 A. No. So I was staying -- when King --</p> <p>2 Q. Yes.</p> <p>3 A. He already, like, been up there, so the</p> <p>4 rooms that he had, he already had them. So I never,</p> <p>5 like, seen him rent a room because he already had the</p> <p>6 room. He never just not -- didn't have the room, if</p> <p>7 that makes sense. So he never had to go re-rent a</p> <p>8 room.</p> <p>9 And then with Cash, yes --</p> <p>10 Q. Can I have -- stop you there and we'll</p> <p>11 get to Cash --</p> <p>12 A. Uh-huh.</p> <p>13 Q. -- so I don't -- so we don't get</p> <p>14 confused.</p> <p>15 A. Okay.</p> <p>16 Q. Okay. All right. Okay.</p> <p>17 So how long were you -- how long were you</p> <p>18 being trafficked by King during this first period</p> <p>19 we're talking about?</p> <p>20 A. Maybe like a week and some days.</p> <p>21 Q. Okay. And can you tell me sort of what a</p> <p>22 day would look like? I mean, were you -- were you</p> <p>23 being trafficked all day long during that -- during</p> <p>24 that week?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 56</p> <p>1 12 plays a day.</p> <p>2 Q. Okay.</p> <p>3 A. I'm not sure, like, the exact number, but</p> <p>4 it's like around that.</p> <p>5 Q. Okay. No, that --</p> <p>6 A. It varied.</p> <p>7 Q. Yeah. That's why I'm trying to get just</p> <p>8 an idea.</p> <p>9 And were you -- when you were having --</p> <p>10 when you were having sex with these plays or having a</p> <p>11 play, or whatever you want to call it, were there</p> <p>12 other people in the room?</p> <p>13 A. No.</p> <p>14 Q. Okay.</p> <p>15 A. No. So if, like, the rooms are</p> <p>16 preoccupied or something, we'll use the car. Like,</p> <p>17 we'll have the play in the parking lot, and they will</p> <p>18 just park the car, like, on the backside or just</p> <p>19 somewhere where it's not a whole bunch of people</p> <p>20 walking by.</p> <p>21 Q. Did you do that?</p> <p>22 A. Did I do what?</p> <p>23 Q. Did you do a play in a -- in the parking</p> <p>24 lot sometimes?</p> <p>25 A. Yes, ma'am.</p>
<p style="text-align: right;">Page 55</p> <p>1 Q. Okay.</p> <p>2 A. (Witness unresponsive.)</p> <p>3 Q. Okay.</p> <p>4 A. I'm sorry. It was like -- so with King,</p> <p>5 it was, like, a 24/7 thing, like sun up to sun down.</p> <p>6 So he used to, like, give us pills and stuff so that</p> <p>7 we can stay up, like, you know, so we can keep</p> <p>8 working. But, like, we would work all day when it</p> <p>9 came to King. He would even sometimes, like, us take</p> <p>10 a nap or something, and he would get the phone and</p> <p>11 start like getting the plays to come in, like, just</p> <p>12 wake us up when, like, the plays are there and stuff</p> <p>13 like that, but we were always working.</p> <p>14 Q. Okay. Okay. And you answered a question</p> <p>15 I was going to have. I didn't know what we were</p> <p>16 going to call the -- the men that came -- that came</p> <p>17 to have sex with you, we're going to call them -- you</p> <p>18 would call them a "play"?</p> <p>19 A. Yes, ma'am.</p> <p>20 Q. All right.</p> <p>21 A. Yes.</p> <p>22 Q. So can you tell me, Ms. Grimes, how many</p> <p>23 plays you -- you were doing a day for King while you</p> <p>24 were working for him?</p> <p>25 A. Like a whole day. I have probably like</p>	<p style="text-align: right;">Page 57</p> <p>1 Q. Okay. What is your understanding -- we</p> <p>2 mentioned the ads.</p> <p>3 Is that your understanding of where these</p> <p>4 plays came from, that men would see your ad on</p> <p>5 ListCrawler and make arrangements that way? Or were</p> <p>6 there other -- other ways as well that you know of?</p> <p>7 A. It was through ListCrawler. Like, it</p> <p>8 would be, like, men -- we would make plays with men</p> <p>9 at the hotel. We would make -- we were on Memorial</p> <p>10 Drive, so there was a lot of traffic. Like, you</p> <p>11 could just stand outside, and cars would come</p> <p>12 through. So it was, like, three different ways.</p> <p>13 Q. Okay. So you talked about the ads, then</p> <p>14 you talked about just people at the hotel?</p> <p>15 A. (Witness indicating.)</p> <p>16 Q. Okay. And then you talked about traffic</p> <p>17 from Memorial Drive?</p> <p>18 A. (Witness indicating.)</p> <p>19 Q. Are those -- are those the three ways</p> <p>20 you're talking about?</p> <p>21 A. Yes, ma'am.</p> <p>22 Q. Okay. Okay. Did King have other people</p> <p>23 working with him, men or women helping him in any</p> <p>24 way, or was it just him?</p> <p>25 A. Like, did he have other girls working?</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 58..61**

Page 58	Page 60
<p>1 Q. That's not what I'm asking about.</p> <p>2 I'm asking about other -- like, other</p> <p>3 people helping him.</p> <p>4 A. Oh. If he did, I didn't know about them.</p> <p>5 Q. Okay. But let me confirm, and I think</p> <p>6 you did -- we have -- I think you have told me that</p> <p>7 at this time he did -- there were two other girls who</p> <p>8 were -- who were being trafficked as well by King; is</p> <p>9 that right?</p> <p>10 A. There were two girls in the room with me,</p> <p>11 yes, who were being trafficked by him, but he had</p> <p>12 other girls up there too working for him.</p> <p>13 Q. At this same time?</p> <p>14 A. Yes, ma'am. I actually met one of the</p> <p>15 girls too, but she wasn't staying in the room with</p> <p>16 us, though.</p> <p>17 Q. Okay. So you met two girls, but you say</p> <p>18 there were others he was trafficking as well and you</p> <p>19 met one of them?</p> <p>20 A. Uh-huh.</p> <p>21 Q. Okay. What was her name? Do you know?</p> <p>22 A. It was Promise.</p> <p>23 Q. Promise?</p> <p>24 A. Uh-huh.</p> <p>25 Q. Okay. So just to confirm, you said King</p>	<p>1 A. I tried to, like, keep some of the money,</p> <p>2 but he knew, so, like, it was like a big fight or</p> <p>3 whatever had happened. He had kicked me out of the</p> <p>4 room, so I am just like in the -- the little hallway</p> <p>5 of the hotel, like, where the front desk is and,</p> <p>6 like, the stairs and stuff.</p> <p>7 Q. Uh-huh.</p> <p>8 A. Like, the elevators and stuff. I am in</p> <p>9 that little hallway, and then I had ended up -- and</p> <p>10 it's nighttime too, and I had ended up meeting Cash</p> <p>11 and his girlfriend, or the girl he was with.</p> <p>12 Q. That's when you met Cash and his</p> <p>13 girlfriend?</p> <p>14 A. (Witness indicating.)</p> <p>15 Q. Okay. And so what happened there?</p> <p>16 A. They told me I could come in their room.</p> <p>17 They asked me what was going on. I told them what</p> <p>18 was going on, and they told me that I could come stay</p> <p>19 with them, like, in their room.</p> <p>20 Q. Okay. Is that what you did?</p> <p>21 A. (Witness indicating.)</p> <p>22 Q. All right. And then what happened after</p> <p>23 that?</p> <p>24 A. Like after --</p> <p>25 Q. So you went up to their room, you spent</p>
Page 59	Page 61
<p>1 sort of had all of the rooms. You didn't ever go,</p> <p>2 like, to the front desk with him to -- to pay for a</p> <p>3 room or anything like that; is that right?</p> <p>4 A. No. I was always, like, around the</p> <p>5 hotel, though.</p> <p>6 Q. Okay.</p> <p>7 A. But I never went to purchase the room,</p> <p>8 though, no.</p> <p>9 Q. Okay. And just so I am clear, do you</p> <p>10 know whose name his -- he rented -- the -- do you</p> <p>11 know whose name the rooms he rented or rented in?</p> <p>12 A. No, ma'am.</p> <p>13 Q. Okay. So did you get any money for</p> <p>14 plays? Were you given any money?</p> <p>15 A. No.</p> <p>16 Q. All the money went to King presumably?</p> <p>17 A. Yes.</p> <p>18 Q. So what happened next after that week or</p> <p>19 some -- week plus, you called it, that you were</p> <p>20 working for King?</p> <p>21 A. I had actually, like, tried to, like,</p> <p>22 take some money. So after, like, I had --</p> <p>23 Q. Take some money; is that what you --</p> <p>24 A. Yes.</p> <p>25 Q. Okay.</p>	<p>1 the night, I mean --</p> <p>2 A. So, like, the rest of the time period I</p> <p>3 was at the United Inn, it was with Cash and the other</p> <p>4 people that he was with.</p> <p>5 Q. Okay. And how long was that,</p> <p>6 approximately?</p> <p>7 A. Like, four weeks. So it was until, like,</p> <p>8 November. Like, the middle, end of November when he</p> <p>9 had got locked up. It was until he had got locked</p> <p>10 up.</p> <p>11 Q. Okay. And he was arrested at the United</p> <p>12 Inn?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Did you ever go back to work for</p> <p>15 King, or that was the end of that?</p> <p>16 A. Not during this time period, no.</p> <p>17 Q. Okay. So in October, November, not -- no</p> <p>18 more with King. Okay.</p> <p>19 So tell me -- so then you were trafficked</p> <p>20 by Cash, it sounds like?</p> <p>21 A. Yes.</p> <p>22 Q. All right. And where in the hotel did</p> <p>23 this occur?</p> <p>24 A. So Cash had, like, multiple rooms. Like,</p> <p>25 King he had two rooms, and those were just his two</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 62..65**

Page 62	Page 64
<p>1 rooms. Cash is, like, we'll check in and check out, 2 like, we -- we were getting different rooms. Like, 3 if he didn't want a room, he will request a different 4 room. Like, we had different rooms. So I would say 5 about, like, four or five rooms in total within that 6 time frame.</p> <p>7 Q. Okay. He would move around?</p> <p>8 A. Uh-huh.</p> <p>9 Q. And was it the -- kind of the same as 10 what you described with King in terms of men would 11 come, either from ListCrawler or they were just at 12 the hotel? Or -- or what -- what was -- was that the 13 same, or was that different?</p> <p>14 A. It was kind of, like, the same, yeah. 15 But with Cash, it was, like, majority, like, most of 16 our plays came from, like, outside. Like, not on 17 ListCrawler. They came from, like, the hotel and 18 Memorial Drive and stuff like that.</p> <p>19 Q. When you talk about coming from Memorial 20 Drive, did -- did you ever go out? Were you ever 21 asked to go out, or did you ever go out and walk 22 Memorial Drive?</p> <p>23 A. Yeah. Cash used to make me and the other 24 girl do that, yeah.</p> <p>25 Q. What -- let's see.</p>	<p>1 A. King again.</p> <p>2 Q. How did you end up back at the United 3 Inn?</p> <p>4 A. Kimani. A boy named Kimani.</p> <p>5 Q. Okay.</p> <p>6 A. Well, this man named Kimani brought me 7 there.</p> <p>8 Q. Okay. We started talking about Kimani, 9 and then I think we realized we might be confused on 10 the time frame.</p> <p>11 A. Uh-huh.</p> <p>12 Q. So let me ask you, again, how did -- 13 who -- I think you said you met Kimani at the United 14 Inn -- excuse me, at the Stone Mountain Inn?</p> <p>15 A. Yeah, that was my first time ever meeting 16 him, but we never, like, lost contact. Like, I was 17 still in contact.</p> <p>18 Q. The first time you ever met him was at 19 the United -- excuse me, at the Stone Mountain Inn, 20 but --</p> <p>21 A. Yes. Like, in that time period, yes.</p> <p>22 Q. Okay.</p> <p>23 A. That was my first time meeting him.</p> <p>24 Q. All right. And you were -- during this 25 stay in January of 2019, you were there for two or</p>
Page 63	Page 65
<p>1 What is the name of the other girl you're 2 talking about?</p> <p>3 A. Her name is Mini.</p> <p>4 Q. Mini?</p> <p>5 A. Uh-huh.</p> <p>6 Q. Okay. And so that -- that stay at the 7 hotel -- at the United Inn ended when Cash was 8 arrested?</p> <p>9 A. (Witness indicating.)</p> <p>10 Q. Okay. And did Cash have anyone helping 11 him?</p> <p>12 A. Yeah. It was like Cash has, like, three 13 other men with him.</p> <p>14 Q. Okay. Do you know their names?</p> <p>15 A. No. But they're in the police report as 16 well.</p> <p>17 Q. Okay. All right. Okay. 18 And then let's talk about, if we could, 19 the second -- or the next time you were at the United 20 Inn, which was in January of 2019.</p> <p>21 A. Correct.</p> <p>22 Q. And -- and you said that was, I think, 23 for two or three days is what you told me.</p> <p>24 A. (Witness indicating.)</p> <p>25 Q. And who was trafficking you then?</p>	<p>1 three days -- two to three days?</p> <p>2 A. (Witness indicating.)</p> <p>3 Q. And where -- where on the property were 4 you? Where at the United Inn?</p> <p>5 A. We were actually, like, right by the 6 hallway. We were on the bottom floor so the main 7 level right in the front. Like, so if you look at 8 the lobby --</p> <p>9 Q. Uh-huh.</p> <p>10 A. -- we were literally on the right, and we 11 were probably like two, three doors down from the 12 lobby. We were right there.</p> <p>13 Q. Okay. And you were trafficked by King 14 during that time period?</p> <p>15 A. (Witness indicating.)</p> <p>16 Q. Okay. Do you know what the -- the dates 17 were of that?</p> <p>18 A. No. I just know it was, like, early 19 January.</p> <p>20 Q. Okay. And -- and what happened? Why did 21 you end up leaving the United Inn after that?</p> <p>22 A. That's what I was -- I really don't even 23 recall why we had left, but we had left. I don't 24 remember why, though.</p> <p>25 Q. Okay. And who is "we" that you're</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 66..69**

Page 66	Page 68
<p>1 talking about?</p> <p>2 A. Me and two other girls that I was with.</p> <p>3 Q. Okay. And who were those girls?</p> <p>4 A. Rose and Naynay (PH).</p> <p>5 Q. Okay. If I were to ask you to -- to put</p> <p>6 me in touch with somebody who could say, yes, I was</p> <p>7 at the United Inn with -- with Jhordyn Grimes in</p> <p>8 either October or November of 2018 or 20- -- or</p> <p>9 January 2019, who would that be? Like, who could</p> <p>10 confirm that you were there?</p> <p>11 A. Rose, my family. I have friends and</p> <p>12 messages texting me saying that they seen me there</p> <p>13 during this time frame. Like, really been -- anybody</p> <p>14 who know what I had went through at the time, they</p> <p>15 can all confirm that.</p> <p>16 Q. But who -- let me ask a better question.</p> <p>17 Who was there -- who was there with you?</p> <p>18 A. Who was there with me?</p> <p>19 Q. Yeah.</p> <p>20 A. Rose, Naynay, Kevy, Mini, and that's</p> <p>21 about it.</p> <p>22 Q. Do you know -- are you still in touch</p> <p>23 with these people; Rose, Naynay, Kevy, and Mini?</p> <p>24 A. Kevy, I'm still in touch with -- well, I</p> <p>25 can get in contact with her. Rose, I can --</p>	<p>1 Inn, did you yourself make use of any phone,</p> <p>2 telephone or cell phones, to -- to contact plays</p> <p>3 or -- or your traffickers?</p> <p>4 A. Like, did I have a telephone?</p> <p>5 Q. Yeah.</p> <p>6 A. Yes, ma'am.</p> <p>7 Q. You had a phone. But did you use it</p> <p>8 for -- I mean to -- like, did you contact -- did you</p> <p>9 personally interact with plays and, you know, tell</p> <p>10 them where to go -- you know, where to come or this</p> <p>11 and that? Or did your traffickers do that?</p> <p>12 A. It varied. Like, sometimes it would be</p> <p>13 them; sometimes it would be me texting.</p> <p>14 Q. So sometimes you would text the plays</p> <p>15 yourself?</p> <p>16 A. Correct.</p> <p>17 Q. Okay. Do you still have the phone or</p> <p>18 phones that you used for that?</p> <p>19 A. No, I don't. They're all used as</p> <p>20 evidence. They're all confiscated by the police.</p> <p>21 Q. Okay. Do you know who was arrested with</p> <p>22 Cash when he was arrested?</p> <p>23 A. Yeah. It was the -- the men that were</p> <p>24 with him.</p> <p>25 Q. I'm sorry?</p>
Page 67	Page 69
<p>1 everybody on that list, I can get in contact with</p> <p>2 them. We just don't really talk anymore.</p> <p>3 Q. Okay. So -- and just to confirm, you're</p> <p>4 telling me these are all people you could get in</p> <p>5 touch with who could -- who would say, yes, they were</p> <p>6 at the United Inn with you when you were being</p> <p>7 trafficked?</p> <p>8 A. Correct. Correct.</p> <p>9 Q. Okay. Who is Chonty Clarke?</p> <p>10 A. That's Rose.</p> <p>11 Q. And were the -- were these four -- these</p> <p>12 are all women; Rose, Naynay, Kevy, and Mini --</p> <p>13 A. Correct.</p> <p>14 Q. -- were they all trafficked at the United</p> <p>15 Inn with you?</p> <p>16 A. Rose was. Mini was. Kevy, that's the</p> <p>17 girl who had brought me, and then she, like,</p> <p>18 disappeared that same day. And then Naynay -- Naynay</p> <p>19 was with us too, so yes.</p> <p>20 Q. So Rose --</p> <p>21 A. Naynay.</p> <p>22 Q. -- Naynay and Mini were all?</p> <p>23 A. And Mini.</p> <p>24 Q. Okay. Okay.</p> <p>25 When you were trafficked at that United</p>	<p>1 A. The three men that he -- were with him.</p> <p>2 They all had got arrested.</p> <p>3 Q. Okay.</p> <p>4 A. And I think Raven had got arrested too.</p> <p>5 It was another girl in the room with us as well.</p> <p>6 Q. Okay.</p> <p>7 A. And I -- I believe she had got arrested</p> <p>8 too. I'm not sure.</p> <p>9 Q. Do you -- are you still in touch with</p> <p>10 her?</p> <p>11 A. No.</p> <p>12 Q. Okay. When Cash was renting rooms, you</p> <p>13 said he moved from room to room a bit.</p> <p>14 Do you know the name he used to rent the</p> <p>15 rooms?</p> <p>16 A. No, but -- no, I don't, actually. But</p> <p>17 I'm -- I'm pretty sure it was probably his name</p> <p>18 because whatever ID he was showing them, I'm pretty</p> <p>19 sure it had to be him.</p> <p>20 Q. And did we say earlier his name is in the</p> <p>21 police report?</p> <p>22 A. Correct.</p> <p>23 Q. Okay. Would you know it if I said it?</p> <p>24 A. Yes, ma'am.</p> <p>25 Q. Okay. We will come back to it. I got</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 70..73**

Page 70	Page 72
<p>1 it. One second.</p> <p>2 Keiron Perry?</p> <p>3 A. No, ma'am.</p> <p>4 Q. Quinton Antwan Bush?</p> <p>5 Endco Corey Forest?</p> <p>6 A. That's Cash.</p> <p>7 Q. Endco Corey Forest is Cash?</p> <p>8 A. Correct.</p> <p>9 Q. Okay. Thanks.</p> <p>10 Do you know who those other two gentlemen</p> <p>11 are?</p> <p>12 A. They were just in the room with us, like,</p> <p>13 the whole time period we were there. They were with</p> <p>14 Cash.</p> <p>15 Q. Were they arrested as well?</p> <p>16 A. Yes, ma'am.</p> <p>17 Q. Okay. Are you okay? Do you need a</p> <p>18 break?</p> <p>19 A. No, I'm good.</p> <p>20 Q. Are there any photos taken by you or</p> <p>21 anyone else at the United Inn?</p> <p>22 A. Yes, ma'am.</p> <p>23 Q. Okay. And did you provide those to your</p> <p>24 attorney?</p> <p>25 A. Yes, ma'am.</p>	<p>1 paperwork-wise that will say that.</p> <p>2 Q. Okay.</p> <p>3 A. I think it's, like, police reports too,</p> <p>4 but that's, like, it.</p> <p>5 Q. So you are saying that, if I am</p> <p>6 understanding you correctly, you received one of</p> <p>7 these trespass papers from the hotel; is that right?</p> <p>8 A. Yes, the day Cash had got locked up.</p> <p>9 Q. Okay. And does it have your name -- it</p> <p>10 has your name on it?</p> <p>11 A. No.</p> <p>12 Q. Whose --</p> <p>13 A. It has my cousin. I gave them another</p> <p>14 name.</p> <p>15 Q. Okay. What name did you give them?</p> <p>16 A. Shameka Grimes.</p> <p>17 Q. What's the first name?</p> <p>18 A. Shameka.</p> <p>19 Q. Spell it. Does it have a spelling, in</p> <p>20 your -- in your mind? How do you spell it?</p> <p>21 A. Ah --</p> <p>22 Q. Shameka?</p> <p>23 A. Yes, ma'am.</p> <p>24 Q. Okay. And you used your real last name,</p> <p>25 Grimes?</p>
Page 71	Page 73
<p>1 Q. Okay. Was it photos or video or both?</p> <p>2 A. Both.</p> <p>3 Q. Okay. All right. We'll come back to</p> <p>4 this.</p> <p>5 Do you have -- we talked about people you</p> <p>6 know who could -- who would -- who would confirm you</p> <p>7 were at the United Inn with you.</p> <p>8 Did you take anything from the United</p> <p>9 Inn, like a towel, a -- you know, an ashtray?</p> <p>10 Anything that you could say, "Look, this is from the</p> <p>11 United Inn"?</p> <p>12 A. No, ma'am. That was in 2018.</p> <p>13 Q. Okay. And I'm -- I understand.</p> <p>14 A. Yeah.</p> <p>15 Q. I'm just trying to ask questions.</p> <p>16 A. Yeah.</p> <p>17 Q. Do you have any paperwork that you --</p> <p>18 like, did you leave the United Inn with like a room</p> <p>19 receipt or a room key or an invoice or a bill,</p> <p>20 anything like that?</p> <p>21 A. No, I didn't, except for the paper that I</p> <p>22 signed when Cash had got arrested, and they, like,</p> <p>23 did the trespassing. You can't come back on the</p> <p>24 property basically because all of that had happened.</p> <p>25 That's the only, like, thing that I have</p>	<p>1 A. Yeah, because that's her real last name</p> <p>2 too.</p> <p>3 Q. Do you have a cousin named Shameka</p> <p>4 Grimes?</p> <p>5 A. Yes, ma'am, I do.</p> <p>6 Q. Okay. So you just gave them your</p> <p>7 cousin's name?</p> <p>8 A. Correct.</p> <p>9 Q. Okay. You mentioned that -- and I'm</p> <p>10 sorry, I can't remember who it was. So let me ask</p> <p>11 you -- I think it was King had given you drugs so you</p> <p>12 could stay awake?</p> <p>13 A. Uh-huh.</p> <p>14 Q. Do you know what kind of drugs you were</p> <p>15 given?</p> <p>16 A. No. I just know, like, they were, like,</p> <p>17 pills, and they just made you stay up. Like, you</p> <p>18 don't get tired on them.</p> <p>19 Q. Okay. Did Cash do that as well?</p> <p>20 A. He did actually as well, yeah.</p> <p>21 Q. Do you know --</p> <p>22 A. But his -- do I know what they're called?</p> <p>23 Q. Yeah.</p> <p>24 A. No. But it was -- whatever the pill was,</p> <p>25 it was the same thing.</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 74..77**

Page 74	Page 76
<p>1 Q. Okay.</p> <p>2 A. Like --</p> <p>3 Q. Did they have -- did they call them</p> <p>4 something? Like, do they have a nickname?</p> <p>5 A. It was, but I can't think of, like, the</p> <p>6 name that they used for them.</p> <p>7 Q. Okay.</p> <p>8 A. But it -- you know, like -- like, they</p> <p>9 will be, like, little pills, and, like, it will be</p> <p>10 in, like, a shape or something, and they come in,</p> <p>11 like, different colors.</p> <p>12 Q. Like, a gummy of some kind?</p> <p>13 A. No.</p> <p>14 Q. Or an actual pill?</p> <p>15 A. It was like an actual pill.</p> <p>16 Q. Okay. Okay. If you think of it, let me</p> <p>17 know.</p> <p>18 But it was the same for both King and</p> <p>19 Cash?</p> <p>20 A. Yes, ma'am.</p> <p>21 Q. Were they also selling drugs?</p> <p>22 A. Cash was; King wasn't.</p> <p>23 Q. Do you know what kind of drugs he was</p> <p>24 selling?</p> <p>25 A. Cash?</p>	<p>1 THE VIDEOGRAPHER: This is the</p> <p>2 beginning of Media No. 3 in the deposition</p> <p>3 of Jhordyn Grimes. The time is 11:51 a.m.,</p> <p>4 and we are on the record.</p> <p>5 BY MS. RICHENS:</p> <p>6 Q. All right. Ms. Grimes, I just have a</p> <p>7 couple of follow-up questions, and then we're going</p> <p>8 to move to another topic.</p> <p>9 So we have talked about Cash and his</p> <p>10 associates, the -- the men that were helping him and</p> <p>11 then King.</p> <p>12 Did any of those gentlemen carry weapons?</p> <p>13 Did they have guns?</p> <p>14 A. Every single one of them, yes.</p> <p>15 Q. All of them had guns?</p> <p>16 A. Yeah.</p> <p>17 Q. What did they -- I mean, did they ever</p> <p>18 threaten you with them, or what did they do with</p> <p>19 them?</p> <p>20 A. Not Cash, but the -- Cash never, like,</p> <p>21 threatened me, but him and, like, the other girl used</p> <p>22 to, like, actually, like -- like, he used to threaten</p> <p>23 her and beat her up and, like, stuff like that. But</p> <p>24 the other men who were in the room, they did. They</p> <p>25 have threatened me a couple of times, but...</p>
Page 75	Page 77
<p>1 Q. Yes.</p> <p>2 A. He was selling everything, like, ice.</p> <p>3 Q. What is ice?</p> <p>4 A. To be honest, I don't even know. I just</p> <p>5 know, like, that's what it was called.</p> <p>6 Q. It was called "ice." Okay.</p> <p>7 A. I know you can smoke it, though, because</p> <p>8 he smoked it before.</p> <p>9 Q. Okay.</p> <p>10 A. I want to say, like, crack -- whatever</p> <p>11 is, like, the hard rock (Witness indicating.) He</p> <p>12 sold that. The powder, coke, he sold that. He sold</p> <p>13 weed. He sold the same pills that he would give us.</p> <p>14 And I really think that's it.</p> <p>15 Q. Okay. All right.</p> <p>16 MS. RICHENS: Why don't we take a</p> <p>17 break, please.</p> <p>18 THE VIDEOGRAPHER: This is the end of</p> <p>19 Media No. 2. The time is 11:39 a.m., and</p> <p>20 we are off the record.</p> <p>21 (Whereupon, the video camera was</p> <p>22 turned off.)</p> <p>23 (A short recess was taken.)</p> <p>24 (Whereupon, the video camera was</p> <p>25 turned on.)</p>	<p>1 Q. The associates of Cash -- or is that who</p> <p>2 you're talking about?</p> <p>3 A. Yes, ma'am.</p> <p>4 Q. Okay. They -- they threatened you?</p> <p>5 A. Yes, ma'am.</p> <p>6 Q. What about King? Did he ever --</p> <p>7 A. Yes, ma'am. He was violent, yes, ma'am.</p> <p>8 Q. He was violent toward you?</p> <p>9 A. Yes, ma'am.</p> <p>10 Q. Did he hit you?</p> <p>11 A. Yeah. Yes, ma'am.</p> <p>12 Q. The other follow-up question is kind of</p> <p>13 general, and it may have been different depending on</p> <p>14 different times or different places, so just let me</p> <p>15 know.</p> <p>16 But I kind of want to know, like, when</p> <p>17 a -- let's say when -- when it was time for a play</p> <p>18 and you were in a room, I mean, how did that happen?</p> <p>19 Was there someone -- would they send the play to the</p> <p>20 room, or he would know where to come? Or can you</p> <p>21 kind of tell me how that would happen generally? Or</p> <p>22 if it was different -- different times, let me know</p> <p>23 that too.</p> <p>24 A. Could you just ask it one more time? I</p> <p>25 heard you, but just one more time.</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 78..81**

Page 78	Page 80
<p>1 Q. Yeah. Yes.</p> <p>2 So you are in a room expecting a play.</p> <p>3 A. (Witness indicating.)</p> <p>4 Q. How does the play get to the room, or how</p> <p>5 does he know where to come? How does he get into the</p> <p>6 room?</p> <p>7 A. Okay. So, like, it did depend, but,</p> <p>8 like, if it was -- when I was with King, like, when</p> <p>9 you post the ad or whatever, it will say where you</p> <p>10 are at, but it won't have, like, the room number and</p> <p>11 stuff. So once the play is getting ready to come,</p> <p>12 like, he will tell them, like, what room to come to,</p> <p>13 or if there's no rooms available, like, where to park</p> <p>14 at or just park, you know, where you feel comfortable</p> <p>15 because it depended on them too.</p> <p>16 And then, like, we'll meet them down in</p> <p>17 their car. It was really like that with Cash too,</p> <p>18 honestly. The play didn't get the room number until,</p> <p>19 like, they said they were at the United Inn or</p> <p>20 whatever, and then they would just post the room</p> <p>21 number.</p> <p>22 Q. So they would give the -- the play the</p> <p>23 room number. And how -- they would just come and</p> <p>24 knock on the door? The play would come and knock on</p> <p>25 the door, or how would they get in the room?</p>	<p>1 A. For King and Cash.</p> <p>2 Q. Okay.</p> <p>3 A. Yes, ma'am.</p> <p>4 Q. Thank you. I see now what you mean by</p> <p>5 fifty-fifty.</p> <p>6 A. Yes, ma'am.</p> <p>7 Q. Got it.</p> <p>8 And when you had a -- when you would have</p> <p>9 a play in a car, was there a -- like, a particular</p> <p>10 place on the property you would go, or did it depend?</p> <p>11 A. No, it wasn't actually. It really</p> <p>12 depended on where the play wanted to park. So where</p> <p>13 they felt like they would be comfortable out in the</p> <p>14 parking lot, so whether that would be like the front,</p> <p>15 wherever, by the lobby, like where they felt like,</p> <p>16 you know, nothing would happen to them or whatever</p> <p>17 the case may be. Like, whether it's the front or</p> <p>18 whether they felt safer in the back, it -- it really</p> <p>19 just depended on the play.</p> <p>20 Q. Okay. And how would that work? Would a</p> <p>21 play know it was going to be a -- a car play when</p> <p>22 they arrived?</p> <p>23 A. Sometimes, yes. Because when King used</p> <p>24 to post for us, like, he will, like, specify that,</p> <p>25 like, car play or, um -- I can't think of, like, the</p>
Page 79	Page 81
<p>1 A. Yeah, they would knock on the door.</p> <p>2 Q. Okay. How many times did you have a play</p> <p>3 in a -- in a car at the United Inn?</p> <p>4 A. It was like a fifty-fifty thing. Like,</p> <p>5 when there's no room, it's a car play. The United</p> <p>6 Inn, like, the way that it looked -- like even in the</p> <p>7 day, like, at day or night, like, you know, it looks</p> <p>8 unsafe. So some of the plays would come, and they</p> <p>9 wouldn't want to come into the room because of, like,</p> <p>10 the type of people that were around the hotel or,</p> <p>11 like, what was going on. So they would say, like,</p> <p>12 they would feel more comfortable if we came to the</p> <p>13 car, so we came to them. So it was like a</p> <p>14 fifty-fifty thing.</p> <p>15 Q. Okay. So let me -- let me ask again. If</p> <p>16 you know, I mean, was it five times? Ten times? I'm</p> <p>17 just trying to get a number if you know how many</p> <p>18 times you had a play in a -- in a car.</p> <p>19 A. So if I made 12 plays a day, I would say</p> <p>20 I had six plays in a car.</p> <p>21 Q. Okay.</p> <p>22 A. A day.</p> <p>23 Q. Okay. And that was consistent for all --</p> <p>24 A. Yes, ma'am.</p> <p>25 Q. -- the whole time?</p>	<p>1 other word, but, like, where they will come in.</p> <p>2 Q. Okay.</p> <p>3 A. So, like, sometimes, yeah, like, they</p> <p>4 knew beforehand it's going to be done in a car here,</p> <p>5 though. And then sometimes it wasn't supposed to</p> <p>6 have been the car play, but when they seen, like,</p> <p>7 the -- the hotel, that's what they requested. They</p> <p>8 didn't want to come in the room. They would rather</p> <p>9 do it in their car.</p> <p>10 Q. Okay. So you mentioned earlier this</p> <p>11 morning, I believe, Ms. Grimes, we were talking</p> <p>12 generally about walking around on the property.</p> <p>13 Okay?</p> <p>14 And so I want to ask you some questions</p> <p>15 about that.</p> <p>16 A. Uh-huh.</p> <p>17 Q. And we're -- again, of course, we're</p> <p>18 talking just about the United Inn.</p> <p>19 Okay?</p> <p>20 A. Yes, ma'am.</p> <p>21 Q. Okay. So am I correct that there were</p> <p>22 occasions you -- you had to walk around on the</p> <p>23 property?</p> <p>24 A. Yes, ma'am.</p> <p>25 Q. Okay. Can you tell me generally when</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 82..85**

Page 82	Page 84
<p>1 that would be or what -- for what purpose? Why were</p> <p>2 you walking around on the property?</p> <p>3 A. So when I was, like, walking around when</p> <p>4 I was with King, he didn't, like, make us walk the</p> <p>5 property to find plays. Like, majority of the time,</p> <p>6 he already had our plays for us, like, from the ads</p> <p>7 or something like that. But -- so when we would walk</p> <p>8 around, it would be to -- because --</p> <p>9 I don't know if you know this, but the</p> <p>10 hotel, like, they have, like, a store inside the</p> <p>11 hotel. So, like, we'll go down and buy stuff because</p> <p>12 they had like food, hygiene personal -- like, they</p> <p>13 had everything. So it would be to go to purchase,</p> <p>14 like, soap, condoms, noodles, whatever, like, gum,</p> <p>15 toothpaste, stuff like that. Say, we needed to</p> <p>16 switch our towels or something or the bedsheets but</p> <p>17 the housekeeper ladies are gone, we would have to go</p> <p>18 to the front -- so down to do that.</p> <p>19 And then when I was with Cash, it was</p> <p>20 the -- it was the same concept, but it was kind of</p> <p>21 different because Cash, like, had -- he, like, made</p> <p>22 us, like, walk around to find plays too. So at that</p> <p>23 point, like, we were still going to the office and</p> <p>24 stuff for what it was doing with King as well so,</p> <p>25 like, purchasing things and switching out, you know,</p>	<p>1 A. (Witness indicating.)</p> <p>2 Q. Okay. When you're -- when you're</p> <p>3 doing -- and I'm going to call it "strolling."</p> <p>4 Is that okay?</p> <p>5 A. (Witness indicating.)</p> <p>6 Q. So we know what we're talking about.</p> <p>7 When you're strolling, were you by</p> <p>8 yourself?</p> <p>9 A. No. It was -- Cash didn't, like, let us</p> <p>10 go outside by ourself, nor did King, honestly, but it</p> <p>11 would always be Mini and another man. So it would</p> <p>12 always be me and Mini and another one of Cash's</p> <p>13 associates, but it was never just, like, me or just</p> <p>14 her or like that.</p> <p>15 Q. There was always one of these men, who</p> <p>16 were Cash's associates, with you?</p> <p>17 A. (Witness indicating.)</p> <p>18 Q. And so what would you do? You would just</p> <p>19 walk -- you would look for people to -- to approach?</p> <p>20 A. Yeah, like, I mean, basically, yeah, just</p> <p>21 like provocative. Like, you're barely wearing</p> <p>22 clothes. You know, like, men are going to stop for</p> <p>23 that, like, you know, that was just that. Like, you</p> <p>24 really didn't even have to do nothing. You would</p> <p>25 just be there so they can see you, and they will come</p>
Page 83	Page 85
<p>1 towels and sheets, but we were actually, like,</p> <p>2 outside, like, strolling, I guess that's what they</p> <p>3 call it, walking around the property trying to, like,</p> <p>4 find plays and stuff, or, like, we walked up Memorial</p> <p>5 Drive a couple of times.</p> <p>6 Even with King, me and the baby mama, we</p> <p>7 walked across the gas -- to the gas station a couple</p> <p>8 of times to get stuff for all of us, but yeah.</p> <p>9 Q. So you used the term "strolling" to</p> <p>10 describe when you're walking around on the property</p> <p>11 to look for plays.</p> <p>12 A. I mean, no, that's not what I would call</p> <p>13 it, but I know that is what, like, they -- the term</p> <p>14 that people use.</p> <p>15 Q. The term people use.</p> <p>16 A. Yes, ma'am.</p> <p>17 Q. Okay. What -- tell me what that</p> <p>18 involves. Like, what -- what is somebody doing when</p> <p>19 they're doing that?</p> <p>20 A. You're just, like, walking around. Like,</p> <p>21 you barely have clothes on. You know, you look</p> <p>22 provocative, like, and you just walk around and get</p> <p>23 attention, and that's how that was.</p> <p>24 Q. And that's something you did when you</p> <p>25 were working for Cash?</p>	<p>1 like --</p> <p>2 Q. Okay. Was this during the day or at</p> <p>3 night or some of each?</p> <p>4 A. Some of each.</p> <p>5 Q. Okay. And the clothes that you're</p> <p>6 talking about, you said you barely had clothes on.</p> <p>7 Can you describe what you were wearing</p> <p>8 and also tell me were -- were these your clothes or</p> <p>9 the clothes that somebody provided to you?</p> <p>10 A. No, because when I had went to the United</p> <p>11 Inn, I only had, like, one outfit, and that's what I</p> <p>12 had on my body. So...</p> <p>13 Q. I'm sorry. You said when you went to the</p> <p>14 United Inn, you only had one outfit?</p> <p>15 A. Yes.</p> <p>16 Q. Okay.</p> <p>17 A. So -- and that's just, you know, like,</p> <p>18 what I had on when I had went. So the -- everything</p> <p>19 else that I had got, it was provided or it was, like,</p> <p>20 another girl's clothes who was there, like --</p> <p>21 Q. Okay. So what -- like, what kinds of</p> <p>22 clothes would that be when -- if you -- when you're</p> <p>23 strolling?</p> <p>24 A. It would be, like, off-the-shoulder tops,</p> <p>25 crop tops, tank tops, jumpsuits. Well, that's not</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 86..89**

Page 86	Page 88
<p>1 what you call it now. Like, two-piece sets.</p> <p>2 Q. Uh-huh.</p> <p>3 A. Like, leggings, just stuff like that.</p> <p>4 Like, we barely had clothes on, though.</p> <p>5 Q. Okay. How many times -- I'm sorry if I</p> <p>6 asked you this before, but I don't believe I did.</p> <p>7 How many times did you do this strolling</p> <p>8 with -- at the United Inn?</p> <p>9 A. Like, a day?</p> <p>10 Q. Did you do it every day?</p> <p>11 A. Yeah.</p> <p>12 Q. Okay.</p> <p>13 A. Honestly, when I was with Cash.</p> <p>14 Q. Cash? Okay.</p> <p>15 A. Yes, ma'am.</p> <p>16 Q. Okay. I want to ask you now about any</p> <p>17 interactions you had with people who worked at the</p> <p>18 United Inn.</p> <p>19 Okay?</p> <p>20 A. Uh-huh.</p> <p>21 Q. And I don't know if -- we need to break</p> <p>22 it up by -- by the two times that you were there, but</p> <p>23 let me just ask you generally -- or can you tell me</p> <p>24 generally what encounters you had with people who</p> <p>25 worked at the hotel?</p>	<p>1 the United Inn.</p> <p>2 A. So every day they have housekeeping.</p> <p>3 It's like that for any hotel, I believe. So every</p> <p>4 day a housekeeper do come to the room. Sometimes</p> <p>5 we'll allow them to clean the room, and then</p> <p>6 sometimes we'll clean the room ourselves.</p> <p>7 Q. Can I ask you a question about that?</p> <p>8 A. Uh-huh.</p> <p>9 Q. Is this like a -- you know, sometimes you</p> <p>10 go -- well, usually, I think when you go to a</p> <p>11 hotel --</p> <p>12 A. Uh-huh.</p> <p>13 Q. -- housekeeping just kind of goes around</p> <p>14 and knocks on the door.</p> <p>15 Is that what happened there?</p> <p>16 A. Yes, ma'am.</p> <p>17 Q. And so sometimes you would let them in</p> <p>18 and sometimes not?</p> <p>19 A. Yeah. Like, sometimes we'll just clean</p> <p>20 it ourselves, like...</p> <p>21 Q. What would happen when they knocked?</p> <p>22 A. We let them in.</p> <p>23 Q. Okay. But there was some times when they</p> <p>24 knocked and you just didn't let them in or?</p> <p>25 A. Uh-huh.</p>
Page 87	Page 89
<p>1 A. We had encounters -- well, I had</p> <p>2 encounters with housekeeping and then the front desk</p> <p>3 staff. They really didn't have, like, too many</p> <p>4 different types of staff. Those really were, like,</p> <p>5 the only two staff that they had. Like, the</p> <p>6 housekeeping and then the people who, I guess, own</p> <p>7 the hotel or work for the hotel.</p> <p>8 Q. You're saying that's pretty much all</p> <p>9 there was in terms of people who worked there.</p> <p>10 Is that -- is that what you meant?</p> <p>11 A. Uh-huh. Like, the housekeepers and then</p> <p>12 the people who worked in the front.</p> <p>13 Q. Okay.</p> <p>14 A. Like, so they didn't really have, like,</p> <p>15 maintenance and -- I guess that was housekeeping too.</p> <p>16 Q. Okay. All right.</p> <p>17 And you had some interactions with</p> <p>18 housekeeping, and you had some interactions with the</p> <p>19 front desk; is that right?</p> <p>20 A. Yes, ma'am.</p> <p>21 Q. Tell me, if you would -- we'll start with</p> <p>22 housekeeping.</p> <p>23 Describe for me the -- the types of -- I</p> <p>24 don't know how many you had, but how many -- the</p> <p>25 types of interactions you had with housekeeping at</p>	<p>1 Q. Okay.</p> <p>2 A. Like, we'll just do it ourselves.</p> <p>3 Q. Okay.</p> <p>4 A. But we still had to, like, get the</p> <p>5 supplies and stuff from them. But, like, we will</p> <p>6 tell them, like, "We can clean it ourselves. Like,</p> <p>7 you don't have to clean it. We can clean it." But</p> <p>8 we still used their supplies and stuff.</p> <p>9 Q. Would they -- so -- so if they came</p> <p>10 around, you would say, "We don't need you to come in,</p> <p>11 but can we have some towels?" or something -- is</p> <p>12 that what you're describing?</p> <p>13 A. No, not necessarily -- I mean, no, not</p> <p>14 really, like --</p> <p>15 Q. Okay.</p> <p>16 A. -- so they'll come knock on the door --</p> <p>17 Q. Uh-huh.</p> <p>18 A. And they -- let's just say, it's not that</p> <p>19 dirty or something. Like, if the room is dirty,</p> <p>20 housekeeping will clean the room. But if it's, like,</p> <p>21 not too much going on, like, it would be, like, we</p> <p>22 can -- we can clean the room. So they will let us</p> <p>23 get the spray bottle, like the broom or whatever and,</p> <p>24 like, rags to wipe down stuff.</p> <p>25 They would always come in to, like, bring</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 90..93**

Page 90	Page 92
<p>1 us new towels and sheets to, like, sit them in, like, 2 the restroom and stuff. They would always come in 3 and change our sheets. 4 But, like, just cleaning the room, like, 5 they didn't always do that for us, no. But we did 6 interact with housekeeping, like, every day. 7 Q. Okay. 8 A. Well, I did. I'm sorry. I keep saying 9 "we." I did. 10 Q. Okay. So what I hear you saying, and I 11 want to make sure that I'm correct, so you said you 12 interacted with housekeeping every day that they -- 13 that they regularly changed the sheets and towels, 14 but maybe -- may or may not have cleaned the room 15 other than that? 16 A. Hu-huh. Not every day, no. 17 Q. Okay. Did they come in and change the 18 sheets and towels or just kind of hand you sheets and 19 towels? 20 A. Hu-huh. They come in to do, like, that 21 part. 22 Q. Okay. And was it always the same 23 housekeeper, or were there different people at 24 different times? 25 A. No. It was different people.</p>	<p>1 Q. Okay. Did you ever tell them what you 2 were doing there? 3 A. No. 4 Q. Did you ever ask any of them for help? 5 A. No. 6 Q. Did they -- did any of them ever ask you 7 if you needed help? 8 A. No. 9 Q. Okay. And now let's talk, if -- if we 10 can, about -- I'm sorry. 11 Do you know the names of any of the 12 housekeeping staff that you interacted with? 13 A. Hu-huh. 14 Q. Were they men or women? 15 A. They were women. 16 Q. Okay. Do you know, were they black or 17 Indian or white or? 18 A. I honestly don't even remember. 19 Q. Okay. 20 A. I really want to say it was, like, a mix, 21 though. 22 Q. A mix of people? 23 A. Uh-huh. 24 Q. Okay. 25 A. None of them were white, though. I do</p>
Page 91	Page 93
<p>1 Q. Did you ever have any conversations with 2 these housekeeping people? 3 A. Yeah, like, they're actually pretty cool. 4 Not like that, but yes, like, we did talk. 5 Q. They were nice people? 6 A. Yes, ma'am. 7 Q. Okay. Like, what did you talk about? 8 A. It wasn't, like, conversations like that. 9 It would just be, like, about, like, cleaning the 10 room or something. Like, we need new towels. They 11 might -- like, I don't -- they used to try to be 12 funny. Like, we would be like, we need new towels or 13 something. Like, y'all just had new -- like, just 14 little stuff like that, but it was never, like, we 15 were, like, actually, like -- like, really 16 conversating about stuff. It was just, like, stuff 17 about the room and stuff like towels or sheets. 18 Q. So you had pleasant conversations with 19 them about the room or needing to be cleaned or 20 something, but -- but nothing other than that? 21 A. No. They really didn't -- really talk 22 about nothing for real. 23 Q. Okay. Did any -- anybody at housekeeping 24 ever ask you what you were doing there? 25 A. No.</p>	<p>1 remember that, but, like, a mix between, like, black 2 or Hispanic. 3 Q. Okay. Do you believe that when a 4 housekeeper came into the room at the United Inn, it 5 was obvious that the room was being used for sex 6 trafficking? 7 A. Yes, I do, actually. 8 Q. Okay. And tell me why. 9 A. Because it was, like, blatant. Like, the 10 way Cash and King kind of -- like, they were, like, 11 cool with everybody who worked up there. So it was, 12 like, nobody was scared when, like, the 13 housekeeper -- like, I feel like one maid -- when 14 housekeeping come, you may try to hide drugs. You 15 may try to hide guns. You may try to hide the 16 condoms. Like, you know, like, stuff like that, the 17 sheets, the towels. 18 Like, it wasn't like that, though. Like, 19 when housekeeping came, nothing changed. Like, how 20 the room was before, that's how the room still looked 21 when they entered the room. 22 So Cash sold drugs and stuff. 23 Housekeeping may come, it may be, like, drugs 24 scattered all on the desk or something because he's 25 getting ready to re-up or stuff like that. Condoms</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 94..97**

<p style="text-align: right;">Page 94</p> <p>1 in the trash. Like, I don't know. I feel like</p> <p>2 guns -- me personally, I just feel like it was kind</p> <p>3 of common sense, but, you know.</p> <p>4 Q. And I want to make sure I understand what</p> <p>5 you're describing.</p> <p>6 Are you saying that when housekeeping was</p> <p>7 coming, that Cash and King didn't -- didn't scurry</p> <p>8 around and hide things.</p> <p>9 Is that what you mean?</p> <p>10 A. Yeah. Like, what you probably would</p> <p>11 expect that they would be doing, like, that's not</p> <p>12 what happened. Like, they didn't bother to hide</p> <p>13 nothing. Like, they didn't care.</p> <p>14 Q. Did you ever see Cash or King or any of</p> <p>15 Cash's associates or anybody that we're talking about</p> <p>16 give any money to any of the housekeeping people?</p> <p>17 A. Not the housekeeping people, but a front</p> <p>18 lady -- a front desk lady. It was a black lady.</p> <p>19 Cash used to pay her, like, money or drugs because</p> <p>20 she used to buy drugs from him too.</p> <p>21 Q. Okay.</p> <p>22 A. Like, whichever one.</p> <p>23 Q. Okay. So I'm going to -- let me get</p> <p>24 to -- I will get to that. Thank you for flagging</p> <p>25 that.</p>	<p style="text-align: right;">Page 96</p> <p>1 purchase, like, condoms, toothbrush, toothpaste,</p> <p>2 tampons, Tylenol. They sold medicine and stuff too,</p> <p>3 Tylenol, like stuff like that.</p> <p>4 And then with Cash, it was we went to the</p> <p>5 front desk -- oh, same with King too -- like, to</p> <p>6 trade out towels and stuff, but that's only when,</p> <p>7 like, housekeeping was off duty at the time. So,</p> <p>8 like, say, they came around already and it's kind of</p> <p>9 later in the day now, so we'll have to go to the</p> <p>10 front to, like, trade out our towels and stuff or</p> <p>11 sheets and -- yeah.</p> <p>12 And then with Cash, it was the same</p> <p>13 thing, purchasing items from there, trading out our</p> <p>14 sheets and stuff. And then I actually, like, seen</p> <p>15 Cash, like, buy the rooms, so we used to, like, come</p> <p>16 with him to buy the room too. So we were up there</p> <p>17 when he did that.</p> <p>18 And that's all -- like, I didn't, you</p> <p>19 know, really go to the front desk for anything else.</p> <p>20 Q. How many times would you say -- did you</p> <p>21 go to the front desk every day?</p> <p>22 A. Yeah, this was, like, an everyday thing.</p> <p>23 Q. Okay. And would you go by yourself, or</p> <p>24 would you go with somebody?</p> <p>25 A. Sometimes, there was times I went by</p>
<p style="text-align: right;">Page 95</p> <p>1 A. Okay.</p> <p>2 Q. But no -- nobody in housekeeping, you</p> <p>3 never saw?</p> <p>4 A. Yeah, I've never seen him, like, pay</p> <p>5 housekeeping or nothing.</p> <p>6 Q. Okay. Did you ever hear Cash or his</p> <p>7 associates or King ever talk to anybody at</p> <p>8 housekeeping about what was going on in the rooms?</p> <p>9 A. No.</p> <p>10 Q. Okay. Now, I want to talk to you, if I</p> <p>11 may, about the front desk.</p> <p>12 A. Okay.</p> <p>13 Q. So -- so tell me -- you've talked about</p> <p>14 it a little bit, but kind of give me high level, if</p> <p>15 you would, why you would have occasion to go to</p> <p>16 that -- to that office up front. Is that what --</p> <p>17 when you say front desk, is that what you're talking</p> <p>18 about?</p> <p>19 A. Uh-huh.</p> <p>20 Q. Why would you be going to the front desk</p> <p>21 when you were at the United Inn?</p> <p>22 A. With King, if I was going to the front</p> <p>23 desk, it was to purchase, like, purchase things. So</p> <p>24 like I said, they sold, like, personal hygiene, food,</p> <p>25 like, everything you would need. So it would be to</p>	<p style="text-align: right;">Page 97</p> <p>1 myself. Like, to trade the towels or something, I</p> <p>2 went by myself. If I'm about to buy a condom or</p> <p>3 something, I went by myself. You know, like, just if</p> <p>4 I'm purchasing things from down there, like, things</p> <p>5 that we needed, I will go by myself.</p> <p>6 With -- with Cash, it was -- so that was</p> <p>7 with King, like if I needed to go get something, he</p> <p>8 would let me go by myself.</p> <p>9 With Cash, it wasn't -- it was always me</p> <p>10 and somebody else. So me and Mini; or me, Mini, and</p> <p>11 an associate. Like, I wasn't by myself with Cash.</p> <p>12 Q. Was it ever just you and Mini?</p> <p>13 A. Going to the front desk?</p> <p>14 Q. Yes.</p> <p>15 A. Yeah, like, to go -- because they got a</p> <p>16 vending machine right there too so, like, yeah, we'll</p> <p>17 go to the vending machine. It was right in front of</p> <p>18 the front desk. Yeah. I feel like we had to -- I</p> <p>19 don't know if that was me and Mini or that was just</p> <p>20 me. It was me and Mini. We had to go get a key</p> <p>21 recharged too, because back then, like, if you put</p> <p>22 your key by your phone, the key stopped working, so</p> <p>23 we had to go get keys recharged too a couple of times</p> <p>24 for the room.</p> <p>25 Q. Okay. Did you -- was it the same person</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 98..101**

Page 98	Page 100
<p>1 or people working at the front desk?</p> <p>2 A. Yes. So it was, like -- like, it was</p> <p>3 like a group of them.</p> <p>4 Q. Uh-huh.</p> <p>5 A. But, like, they would rotate out, though.</p> <p>6 So, like -- but it would always be, like, the same</p> <p>7 group of people, though.</p> <p>8 Q. Okay.</p> <p>9 A. But I guess it just depends on, like, the</p> <p>10 date or the time of, like, who was in the office, but</p> <p>11 it was always multiple of them in office too. It was</p> <p>12 never just one of them working and, like, you would</p> <p>13 go up to the office, there would be, like, three of</p> <p>14 them back there, but I guess they like, you know,</p> <p>15 rotate out.</p> <p>16 Q. Okay. When you went to the front desk</p> <p>17 for any of these reasons at the United Inn, did --</p> <p>18 did anyone ever ask you what you were doing at the</p> <p>19 hotel?</p> <p>20 A. No.</p> <p>21 Q. Okay. Did anyone -- did you ever tell</p> <p>22 anyone?</p> <p>23 A. No.</p> <p>24 Q. Did anyone ever ask you if you needed</p> <p>25 help?</p>	<p>1 would come to our room, like, and buy drugs from</p> <p>2 Cash.</p> <p>3 Q. Okay. Okay.</p> <p>4 So like I said, he -- she would give him</p> <p>5 money and he would give her drugs?</p> <p>6 A. Yes. I witnessed it --</p> <p>7 Q. Okay.</p> <p>8 -- it was an exchange.</p> <p>9 Q. Okay. Did you ever get to know her name?</p> <p>10 A. No. I just got, like, she was a</p> <p>11 skinny -- she was really skinny, an older black lady.</p> <p>12 She was older.</p> <p>13 Q. And you said you had seen -- she did work</p> <p>14 at the front desk?</p> <p>15 A. Yes, ma'am.</p> <p>16 Q. And -- what did I want to ask?</p> <p>17 Do you know what she was buying?</p> <p>18 A. So that's the thing, like, I don't know,</p> <p>19 like, the exact difference between, like, the --</p> <p>20 like, I know what type of drugs he had, like ice, the</p> <p>21 hard rock, and then, like, the soft powder, like,</p> <p>22 coke or whatever. But like, two of them looked</p> <p>23 similar, but they're like two different names. So,</p> <p>24 like, I don't know because they're both rocks. So I</p> <p>25 don't know if she was buying, like, ice or if she was</p>
Page 99	Page 101
<p>1 A. No.</p> <p>2 Q. Did you ever tell anyone you needed help?</p> <p>3 A. No.</p> <p>4 Q. Now, you mentioned a few minutes ago, and</p> <p>5 I told you we would come back to it, I think you said</p> <p>6 that there was a black woman who --</p> <p>7 A. Uh-huh. She used to buy drugs from Cash,</p> <p>8 or, like, Cash would pay her sometimes for the rooms.</p> <p>9 Q. What do you mean -- I'm sorry.</p> <p>10 So who -- there was a black woman at the</p> <p>11 front desk?</p> <p>12 A. Uh-huh.</p> <p>13 Q. Was -- was she working at the front desk?</p> <p>14 A. Yes, ma'am.</p> <p>15 Q. Okay. And she would buy drugs from Cash?</p> <p>16 A. Yeah, I seen her, like, come to the room</p> <p>17 a couple of times and buy drugs from Cash.</p> <p>18 Q. So what did you actually see taking place</p> <p>19 with her and him?</p> <p>20 A. What do you mean?</p> <p>21 Q. You said she bought drugs from Cash.</p> <p>22 A. Uh-huh.</p> <p>23 Q. So did you literally see him hand her</p> <p>24 drugs and she gave him cash?</p> <p>25 A. Yeah, like I would be in the -- like, she</p>	<p>1 buying crack.</p> <p>2 Q. Some kind of rock as opposed to some kind</p> <p>3 of pill --</p> <p>4 A. Yeah.</p> <p>5 Q. -- is that fair?</p> <p>6 A. Yes, ma'am.</p> <p>7 Q. Okay. Did anyone who worked at the hotel</p> <p>8 ever ask you how old you were?</p> <p>9 A. No.</p> <p>10 Q. Have you, in the last half hour or so as</p> <p>11 we have been talking, told me all of your</p> <p>12 interactions with people who worked at the -- who</p> <p>13 worked at United Inn & Suites?</p> <p>14 A. Yeah, like with housekeeping.</p> <p>15 Q. We talked about housekeeping, and then we</p> <p>16 talked about the front desk.</p> <p>17 A. Uh-huh.</p> <p>18 Q. Are there any --</p> <p>19 A. Because those were the only staff.</p> <p>20 Q. Okay. So we have covered everything?</p> <p>21 Your inter- -- your general inter- -- your</p> <p>22 interactions with people who worked at the hotel?</p> <p>23 A. I mean, I would interact with them every</p> <p>24 day, but it was, like, the same people, though, so --</p> <p>25 but we interacted every day. Like, the black lady,</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 102..105**

Page 102	Page 104
<p>1 she used to -- like, when Cash would go buy rooms or</p> <p>2 something, say, they will say, like, a room is sold</p> <p>3 out, because I told you he will, like, check in and</p> <p>4 check back out.</p> <p>5 Q. Right.</p> <p>6 A. Like, he never -- never, like, had just a</p> <p>7 set room how King had, like, a set room. So she</p> <p>8 would be, like, sometimes you can't check in before a</p> <p>9 certain time at a hotel, like you're just not</p> <p>10 supposed to. Cash would pay her extra, and she would</p> <p>11 give him the key to the room.</p> <p>12 What else? What else?</p> <p>13 Like, she used to -- we had, like, a room</p> <p>14 on the end hall, but really, she did this with, like,</p> <p>15 two of the rooms we had, though. Like, she will tell</p> <p>16 us if we -- and she really worked night shift too.</p> <p>17 That's really when she used to work, night shift.</p> <p>18 Q. Is this the -- the black lady that you're</p> <p>19 talking about?</p> <p>20 A. But it -- yes, the black lady.</p> <p>21 Q. Okay.</p> <p>22 A. But it would like roll over to the day</p> <p>23 sometimes too, but really worked night shift.</p> <p>24 So, like, she will tell us -- say, we're</p> <p>25 having too much traffic coming in and out of the room</p>	<p>1 Q. Okay.</p> <p>2 A. It was always her telling Cash that</p> <p>3 because he's the one who would be purchasing the</p> <p>4 rooms.</p> <p>5 Q. And how do you know that she told Cash</p> <p>6 that?</p> <p>7 A. I witnessed it --</p> <p>8 Q. Okay.</p> <p>9 A. -- a couple of times. She did it a</p> <p>10 couple of times.</p> <p>11 Q. Okay. And so tell me, like, where that</p> <p>12 happened. You know, like, you witnessed -- if I'm</p> <p>13 hearing you correctly, you witnessed her telling Cash</p> <p>14 there's too much traffic in there.</p> <p>15 A. So, like, she called the hotel phone a</p> <p>16 couple of times. Like, our room -- you can call the</p> <p>17 room from the lobby. She's called our room a couple</p> <p>18 of times and told us like, "We're watching. You're</p> <p>19 having too much traffic. Okay?"</p> <p>20 At one point she told him to, like, come</p> <p>21 up to the front desk, but it was me, Mini and him.</p> <p>22 She told him the same thing, "You're having too much</p> <p>23 traffic." She suggested that he switch rooms.</p> <p>24 Like, those are the only two times I --</p> <p>25 I've, like, witnessed her do something like that, but</p>
Page 103	Page 105
<p>1 because Cash sold drugs and then what we were also</p> <p>2 doing. So, like, she would warn him, you know, like,</p> <p>3 "You" -- "you have too much traffic coming in and out</p> <p>4 of your room. I suggest that" -- like, at one point,</p> <p>5 she suggested that we switch rooms because we had a</p> <p>6 room at end. Like, it was the end hall upstairs, and</p> <p>7 she suggested that we switch rooms. So that's</p> <p>8 exactly what we did; we switched rooms. Just, like,</p> <p>9 stuff like that.</p> <p>10 Q. Did you hear that conversation yourself?</p> <p>11 A. Yes, ma'am. Like, she would call. Like,</p> <p>12 it's too much traffic, like -- or, like, she would</p> <p>13 tell him to, like, come to the front office. We</p> <p>14 would go to the front office and say the same thing,</p> <p>15 like, it's too much traffic. Like, we are -- we are</p> <p>16 seeing all of these people, you know, like, coming</p> <p>17 and out of the room, like, okay, stuff like that. So</p> <p>18 we switched room.</p> <p>19 Q. So when she called, I mean, did you talk</p> <p>20 to her yourself?</p> <p>21 A. No. Like, I never spoke to her about</p> <p>22 stuff like that. I have spoke to her a couple times</p> <p>23 just, like, regularly speaking, like -- but it was</p> <p>24 never, like, her telling me, like, "Oh, yeah, y'all</p> <p>25 have too much traffic." She never told me that.</p>	<p>1 she did that a couple of times, though.</p> <p>2 Q. Okay. So the time that you said she</p> <p>3 called the room --</p> <p>4 A. Uh-huh.</p> <p>5 Q. -- you didn't talk to her?</p> <p>6 A. No. But you can hear her on the phone,</p> <p>7 though. Yes, it's the room phone. You know, you put</p> <p>8 the phone on speaker.</p> <p>9 Q. Okay.</p> <p>10 A. Yes, ma'am. So...</p> <p>11 Q. So you heard her on speaker.</p> <p>12 And what did she say?</p> <p>13 A. Like, "We are watching you and there's</p> <p>14 too much traffic. Like, we're watching that you're</p> <p>15 having too much traffic. Basically, like, keep it</p> <p>16 down. Okay?"</p> <p>17 The second time that she had called him</p> <p>18 to the room -- I'm sorry, when she had called him to</p> <p>19 the lobby or whatever, it was me and Mini who had</p> <p>20 went with him. It was him too as well, though. So</p> <p>21 it was the three of us who had went up there. And</p> <p>22 then she told him the same thing like, you're --</p> <p>23 there's way too much traffic. And then this time,</p> <p>24 she suggested that he switched rooms. So that's what</p> <p>25 we did; we switched rooms.</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 106..109**

Page 106	Page 108
<p>1 And then --</p> <p>2 Q. Do you know why she was suggesting that?</p> <p>3 A. It was too much traffic.</p> <p>4 Q. Okay.</p> <p>5 A. She --</p> <p>6 Q. But what would switching rooms do? What</p> <p>7 would be the point switching rooms?</p> <p>8 A. I guess so it's not, like, so much</p> <p>9 traffic coming out of that one room. Like, so you</p> <p>10 switch rooms, I guess.</p> <p>11 Q. Just kind of mix it up a bit?</p> <p>12 A. Yeah, so it's not, like, just one room</p> <p>13 having so much traffic. It's multiple rooms having</p> <p>14 traffic, if that makes sense.</p> <p>15 Q. And was the traffic from selling drugs?</p> <p>16 A. No. It was from both.</p> <p>17 Q. From drugs and from traffic -- sex</p> <p>18 trafficking?</p> <p>19 A. Honestly, everybody had traffic coming in</p> <p>20 and out of their rooms at the United Inn, though.</p> <p>21 But, like, Cash, yeah, it was like -- it was bad,</p> <p>22 though, because not only was it, like, sexual; it's</p> <p>23 you're selling drugs as well. So it's, like, two</p> <p>24 different types of -- you know, like, it was just in</p> <p>25 and out, in and out, in and out, yeah.</p>	<p>1 supposed to?</p> <p>2 A. Yes. So money on top of what the room</p> <p>3 was.</p> <p>4 Q. I see.</p> <p>5 A. Yes.</p> <p>6 Q. I see.</p> <p>7 MS. RICHENS: Can we go off the</p> <p>8 record, please?</p> <p>9 THE VIDEOGRAPHER: The time is</p> <p>10 12:31 p.m., and we are off the record.</p> <p>11 (Whereupon, the video camera was</p> <p>12 turned off.)</p> <p>13 (A short recess was taken.)</p> <p>14 (Whereupon, the video camera was</p> <p>15 turned on.)</p> <p>16 THE VIDEOGRAPHER: This is the</p> <p>17 beginning of Media No. 4. The time is</p> <p>18 1:24 p.m., and we are on the record.</p> <p>19 BY MS. RICHENS:</p> <p>20 Q. Good afternoon, Ms. Grimes.</p> <p>21 A. Good afternoon.</p> <p>22 Q. A few follow-up questions on things we</p> <p>23 talked about this morning.</p> <p>24 We had some discussion about the</p> <p>25 occurrence when Cash was arrested at the United Inn</p>
Page 107	Page 109
<p>1 Q. Okay. Other than this lady that you're</p> <p>2 talking about, did you ever see any money exchange</p> <p>3 hands between, you know, your traffickers and their</p> <p>4 associates and anybody that worked at the hotel?</p> <p>5 A. Like, did I ever see them give money to</p> <p>6 the people at the hotel?</p> <p>7 Q. Correct.</p> <p>8 A. No. Unless they're, like, paying for a</p> <p>9 room, like, no.</p> <p>10 Q. Okay. And with respect to the lady we're</p> <p>11 talking about, the money you saw exchanging hands</p> <p>12 there was she was buying drugs? She was giving --</p> <p>13 she was giving Cash money and he -- he was giving her</p> <p>14 drugs?</p> <p>15 A. That, but then there was a time when we</p> <p>16 had went to the front office and he had gave her</p> <p>17 money because we weren't supposed to check in. So he</p> <p>18 used to, like, pay her to, like, you know, like,</p> <p>19 allow us to, like, do stuff. Like, so he gave her</p> <p>20 money because we were trying to check in, but they</p> <p>21 were telling us, like, no rooms were available. We</p> <p>22 cannot check in yet. He paid her, and she gave us</p> <p>23 the key to the room. So like that, like --</p> <p>24 Q. Okay. He paid her money so that she</p> <p>25 would give you the room key earlier than she was</p>	<p>1 in November.</p> <p>2 A. Yes, ma'am.</p> <p>3 Q. Other than that, were you ever present</p> <p>4 for any police activity at the United Inn?</p> <p>5 A. Yes. Well, not the police, but the</p> <p>6 ambulance had came out because Cash had, like, beat</p> <p>7 Mini up in the room, and she called the ambulance.</p> <p>8 So they came to, like, look at her, and I was with</p> <p>9 her because Cash had, like, left.</p> <p>10 Q. Okay.</p> <p>11 A. So it was me and her, and they looked at</p> <p>12 her or whatever, and then that was it. Like, they</p> <p>13 didn't transport her or nothing like -- but, like,</p> <p>14 other than that incident and then when he had got</p> <p>15 locked up, no.</p> <p>16 Q. Okay. Did you ever see any security</p> <p>17 guards at the United Inn?</p> <p>18 A. Yes. They did use to have a security</p> <p>19 guard, and he -- he had, like, a little car. Like,</p> <p>20 he would park his car somewhere and, like, watch from</p> <p>21 the parking lot. But I never seen, like, a security</p> <p>22 guard for patrolling the -- what am I trying to say?</p> <p>23 Like, actively, like, walking around.</p> <p>24 But they did have a security guard,</p> <p>25 though, because I remember seeing his car and he</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 110..113**

Page 110	Page 112
<p>1 would sit in the front sometimes, like, in the 2 parking lot.</p> <p>3 Q. Was it a marked car? Like, a police car 4 or a security car or just an unmarked car of some 5 kind?</p> <p>6 A. No. It was like a -- I guess, like, a 7 security car. It was a cop car.</p> <p>8 Q. Okay.</p> <p>9 A. But you could tell it was security, 10 though, if that makes sense.</p> <p>11 Q. Uh-huh.</p> <p>12 And sometimes parked in front?</p> <p>13 A. Uh-huh.</p> <p>14 Q. And was that there any particular time of 15 day or night? Did you ever notice?</p> <p>16 A. Usually, he was out there at nighttime. 17 That's really when we would see him, like nighttime.</p> <p>18 Q. Did you ever talk to this person?</p> <p>19 A. Hu-huh.</p> <p>20 Q. Did -- did you ever see a security guard 21 walking around the premises?</p> <p>22 A. No. See, now that's the part I'm saying, 23 like, I don't remember -- I don't remember ever 24 seeing, like, someone, like -- well, a security 25 guard, like, patrolling it, but they did have a</p>	<p>1 A. No.</p> <p>2 Q. Okay. You just were -- you were just 3 there doing what you were doing, and you weren't 4 either trying to tell somebody or hide it.</p> <p>5 Is that -- is that fair?</p> <p>6 A. Like, yeah. Like, at the time I wasn't, 7 like, thinking like that. Like, I didn't even know I 8 was, like, really being sex trafficked for real at 9 the time. Like, I didn't really notice what that was 10 but -- so, no. Like, I would go up there, like I 11 wasn't trying to hide it. Like, I would walk around 12 how I was walking around, like, because that's how 13 everybody was, like nobody was hiding nothing.</p> <p>14 Q. Okay.</p> <p>15 A. So I didn't think I had to either.</p> <p>16 Q. Say the last part again.</p> <p>17 A. I said nobody was hiding anything so I 18 didn't, like, think I had to either.</p> <p>19 Q. Got it.</p> <p>20 So based on that and based on what you 21 told us about your interactions with the folks that 22 were working at the front desk, do you think that 23 those people -- do you have any reason to believe 24 those people should have known that you were being 25 sex trafficked?</p>
Page 111	Page 113
<p>1 security guard.</p> <p>2 Q. Okay.</p> <p>3 A. Because we would see his car. Like, and 4 you know he was in the car because, like, a little 5 light would be on, but that was like it. I never, 6 like, seen him, you know.</p> <p>7 Q. Yes, I understand.</p> <p>8 A. Yeah.</p> <p>9 Q. Could you see was he -- if he was in 10 uniform of any kind?</p> <p>11 A. No.</p> <p>12 Q. Okay.</p> <p>13 A. No.</p> <p>14 Q. Did -- I may have asked you this. 15 Did you ever speak to the security guard?</p> <p>16 A. No, I didn't.</p> <p>17 Q. Okay. Before the lunch break, 18 Ms. Grimes, we were talking about visits that you 19 made to the front desk.</p> <p>20 A. Uh-huh.</p> <p>21 Q. When you did -- when you went to the 22 front desk, were you -- I don't know how I want to 23 ask this, but let me see how this works.</p> <p>24 Were you trying to hide the fact that you 25 were being sex trafficked?</p>	<p>1 A. Yes.</p> <p>2 Q. Okay. Tell me why.</p> <p>3 A. Just like the stuff that, like, went on 4 up there, it was, like, common sense. Me, I am 5 walking around --</p> <p>6 First of all, when I was out there, it 7 was cold as I don't know what's outside. Like, I'm 8 walking around with, like, no clothes on. I didn't 9 even own a jacket nor a coat. Like, it was, I had no 10 actual clothes to prepare for that season.</p> <p>11 Back then, I looked my age as well.</p> <p>12 Like, I was supposed to have been in school at that 13 time. I was not in school, but I was supposed to 14 have been. I'm up there for, like, weeks at a time 15 not going to school, like, sun up to sun down you see 16 me every day. Any time of the day you see me. Any 17 time, like, I leave out, it's a man following us.</p> <p>18 Like, it was kind of like -- anytime I left out, it 19 was with a man or Mini and another guy.</p> <p>20 When they will come, like, into the hotel 21 room -- well, housekeeping, when they'll like come to 22 the doors or, like, come in the room, like, like I 23 said, like, everything was out. So we'll have, like, 24 condoms in the trash. We are always switching 25 sheets. Like, I don't -- we're always switching</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 114..117**

Page 114	Page 116
<p>1 sheets. We're always needing new towels and rags</p> <p>2 more than, like, a regular person would.</p> <p>3 Like, you see, like, girls in a room with</p> <p>4 all these men, like, it's -- look at them, look at</p> <p>5 us. Like, that's really just how I feel they should</p> <p>6 know, like how we were walking around. The traffic</p> <p>7 that we had coming in and out, it was just a lot.</p> <p>8 Like, it was blatant, like, what was going on.</p> <p>9 But yeah, that's why I feel like they</p> <p>10 should have known or that they did know. We even --</p> <p>11 one of the workers were, like, telling us, like, when</p> <p>12 we had too much traffic, so, like, you know what's</p> <p>13 going on because you're telling us we're having too</p> <p>14 much traffic, like.</p> <p>15 Q. And that's the lady that we talked about</p> <p>16 before?</p> <p>17 A. Uh-huh. The black lady.</p> <p>18 Q. Okay.</p> <p>19 A. That's the one who, like, used to, like,</p> <p>20 tell us stuff like that.</p> <p>21 Q. How old was she? About how old would you</p> <p>22 say she was?</p> <p>23 A. She was like -- I don't know if she</p> <p>24 looked older or if she really was, like, older, but</p> <p>25 she was like a skinny black lady. I really want to</p>	<p>1 Q. Did you have a feeling for who managers</p> <p>2 were versus employees at -- at the hotel?</p> <p>3 A. Yeah.</p> <p>4 Q. Okay.</p> <p>5 A. I feel like -- from what I have seen,</p> <p>6 like, personally, I feel like because I always seen</p> <p>7 like the same group of people. So, like, I came to</p> <p>8 the conclusion, like, that is a family-owned hotel.</p> <p>9 Like, it's these same people.</p> <p>10 Q. Okay.</p> <p>11 A. You know, and then it's not -- it's not</p> <p>12 like a mix of, like, different races or whatever.</p> <p>13 Like, the only different race was that black lady</p> <p>14 that I seen and then, you know, like, the Hispanic</p> <p>15 housekeepers or whatever. But other than that, it</p> <p>16 was all, like, the same race working.</p> <p>17 And then the way that they even</p> <p>18 interacted with each other, it was like -- it was</p> <p>19 like given, like, y'all are husband or wife or, you</p> <p>20 know, like stuff like that. Like, that's how it came</p> <p>21 across, like, to me. So...</p> <p>22 Q. Were they always speaking in English with</p> <p>23 each other? Did they always speak English with each</p> <p>24 other?</p> <p>25 A. No. They -- they spoke another language</p>
Page 115	Page 117
<p>1 say, like, late 30s, early 40s, like, she was older.</p> <p>2 Q. That's older?</p> <p>3 A. No. I mean --</p> <p>4 Q. You're killing me here.</p> <p>5 A. No. But I was 16 at the time, so, you</p> <p>6 know, like, it was pretty old to me.</p> <p>7 Q. I'm teasing you. I hear you.</p> <p>8 I thought you meant, like, 70?</p> <p>9 A. No, no.</p> <p>10 Q. Okay. And do you know -- this lady that</p> <p>11 you're talking about --</p> <p>12 A. Uh-huh.</p> <p>13 Q. -- do you recall, was she there during</p> <p>14 the time that you were -- you were at United Inn in</p> <p>15 the fall the October/November?</p> <p>16 A. Uh-huh.</p> <p>17 Q. Was she still there in January? Do you</p> <p>18 know?</p> <p>19 A. I actually don't recall ever seeing her</p> <p>20 in January.</p> <p>21 Q. Okay. And so we've talked about that</p> <p>22 lady.</p> <p>23 Is there anyone else that -- well, let me</p> <p>24 ask you this question.</p> <p>25 A. Uh-huh.</p>	<p>1 too.</p> <p>2 Q. Okay.</p> <p>3 A. But when they speak to us, yeah, it's</p> <p>4 English.</p> <p>5 Q. All right.</p> <p>6 A. It was English.</p> <p>7 Q. Okay. So other than the -- the lady we</p> <p>8 have talked about now --</p> <p>9 A. Uh-huh.</p> <p>10 Q. -- the, quote, older lady, was there --</p> <p>11 did -- and you've told us the conversations that she</p> <p>12 had where she told you that you had too much traffic.</p> <p>13 Other than that, did you ever see or hear</p> <p>14 anything that lead you to believe that anybody else</p> <p>15 who worked at United Inn was -- was sort of in on it,</p> <p>16 like helping the traffic- -- helping the traffickers?</p> <p>17 A. Other than, like, just letting, like,</p> <p>18 what was going on, like, slide, like, no. Like, I</p> <p>19 never, like, verbally heard or seen them, like, do</p> <p>20 anything that would, like, help them out, I guess.</p> <p>21 But they, like, let it go on, so I feel like that was</p> <p>22 helping them out, like, but yeah.</p> <p>23 Q. Okay.</p> <p>24 A. I didn't, like -- yeah.</p> <p>25 Q. Okay. Do you know whether King or Cash</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 118..121**

Page 118	Page 120
<p>1 had trafficked women at United Inn previously?</p> <p>2 A. King did. But I only know this because,</p> <p>3 like, he -- like, he would say that. Like -- like,</p> <p>4 he would talk about it. That is how King made his</p> <p>5 money. Like, Cash would sell drugs and do that.</p> <p>6 King was more so, like, that is all he did,</p> <p>7 trafficked women. Like, he had multiple girls.</p> <p>8 Like, that was what he did.</p> <p>9 Like -- like, I told you one of the</p> <p>10 girls -- well, besides the two that I was actually in</p> <p>11 the room with, he had brought, like, another girl up</p> <p>12 there that worked for him and put her in the other</p> <p>13 room, and then he introduced me to her. That's the</p> <p>14 girl named Promise. So I had met her. That's the</p> <p>15 only other girl, like, I had, like, physically, like,</p> <p>16 actually met, except for the two that I was with that</p> <p>17 worked for him.</p> <p>18 But, like, he talked about them all the</p> <p>19 time. Like, he would call them too -- like, they</p> <p>20 would call him if, like, something was going wrong</p> <p>21 and stuff. Like, he was in the room with us, we'll,</p> <p>22 like, hear it. But he used to talk about that,</p> <p>23 though. Like, he was at the United Inn for a while</p> <p>24 even before I had met him, he was already there for a</p> <p>25 while.</p>	<p>1 actually doing at the Stone Mountain Inn in early</p> <p>2 2019?</p> <p>3 A. The same thing. We were being trafficked</p> <p>4 by Ronnie and Joc.</p> <p>5 Q. What's the other person's name? Joc?</p> <p>6 A. Uh-huh.</p> <p>7 Q. Okay. And were you being trafficked?</p> <p>8 A. Yes, ma'am.</p> <p>9 Q. Okay. And Chonty was as well?</p> <p>10 A. Yes, ma'am.</p> <p>11 Q. And is this what prompted the lawsuit</p> <p>12 that -- that you filed against Stone Mountain Inn?</p> <p>13 A. No, it's not, actually. I mean, it's</p> <p>14 part of it, yeah, but that's not, like, why I was --</p> <p>15 no.</p> <p>16 Q. But that's what the lawsuit was about?</p> <p>17 A. Sex trafficking?</p> <p>18 Q. Yes.</p> <p>19 A. Yes, ma'am.</p> <p>20 Q. Okay. And --</p> <p>21 A. Oh, wait. No, I misunderstood the</p> <p>22 question.</p> <p>23 Yes, that's exactly what the lawsuit was</p> <p>24 about, sex trafficking.</p> <p>25 Q. Okay. Okay. And Chonty filed a lawsuit</p>
Page 119	Page 121
<p>1 Q. So let me get back to that, how do you --</p> <p>2 how do you know that?</p> <p>3 A. Because that's what the baby mama and</p> <p>4 them said too. Like, he would say it, the baby mama</p> <p>5 said it, like, they were staying there for a minute.</p> <p>6 They were actually, like, living there.</p> <p>7 Q. Oh. He and his baby mama?</p> <p>8 A. And then a sister, yeah.</p> <p>9 Q. Okay.</p> <p>10 A. When I had met them.</p> <p>11 Q. Okay. Okay. So I understand,</p> <p>12 Ms. Grimes, just to move things along, that in early</p> <p>13 2019, you were arrested for trafficking Chonty Clarke</p> <p>14 at the Stone Mountain Inn; is that correct?</p> <p>15 A. Well, that's what they said at first to</p> <p>16 try to hold me because they couldn't, like, hold me</p> <p>17 for nothing unless they said something like that, so</p> <p>18 yes, ma'am, that's what they said at first.</p> <p>19 Q. Okay. So -- fair enough.</p> <p>20 So let me ask you, and that was --</p> <p>21 because I want to ask you what -- what happened.</p> <p>22 A. Uh-huh.</p> <p>23 Q. I think that was March of 2019.</p> <p>24 So what was -- what were you actually</p> <p>25 doing at the United Inn -- excuse me, what were you</p>	<p>1 against Stone Mountain Inn as well?</p> <p>2 A. As well, yes, ma'am.</p> <p>3 Q. Okay. Did you ever traffic Chonty</p> <p>4 Clarke?</p> <p>5 A. No, I didn't.</p> <p>6 Q. And let me make sure I'm -- we haven't</p> <p>7 really identified the term. But -- so --</p> <p>8 Did you ever make her available for sex</p> <p>9 for money?</p> <p>10 A. No, I didn't.</p> <p>11 Q. Okay. Did you -- have you ever done that</p> <p>12 with any -- any girl or women or boy?</p> <p>13 A. No, I haven't.</p> <p>14 Q. Okay.</p> <p>15 A. No.</p> <p>16 Q. And what you said before is you believe</p> <p>17 that -- tell me again why you think that accusation</p> <p>18 was made against you.</p> <p>19 A. No. I know that's why it made against</p> <p>20 me. It was actually said, like, they couldn't hold</p> <p>21 me so they had to put something against me, but if</p> <p>22 you like -- I don't know if you know, but it's, like,</p> <p>23 court documents, they actually ended up dropping</p> <p>24 every single charge against me, and Joc and Ronnie</p> <p>25 both ended up getting charged. I was labelled a</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 122..125**

Page 122	Page 124
<p>1 victim. Chonty was labeled a victim.</p> <p>2 But in the beginning, it wasn't like</p> <p>3 that, no. I guess they, you know, had to look into</p> <p>4 it or whatever, and then -- yeah.</p> <p>5 Q. Okay. And I am aware of what you're</p> <p>6 talking about --</p> <p>7 A. Yes, ma'am.</p> <p>8 Q. -- in terms of the charges against you</p> <p>9 being dropped.</p> <p>10 How did you and -- were you with Chonty</p> <p>11 at the Stone Mountain Inn in 2019?</p> <p>12 A. In January, I was, but she had ended up</p> <p>13 going back on her own. I wasn't with her at the</p> <p>14 time. I was in a group home.</p> <p>15 Q. Okay.</p> <p>16 A. Uh-huh. That's when -- when she had got</p> <p>17 locked up with Joc -- like when Chonty had got locked</p> <p>18 up at the Stone Mountain Inn --</p> <p>19 Q. Uh-huh.</p> <p>20 A. -- with Joc when the whole thing</p> <p>21 happened. I wasn't present. I was in a group home</p> <p>22 at the time.</p> <p>23 Q. Okay. But you were -- so you were -- I</p> <p>24 guess I'm trying to get -- get the dates straight.</p> <p>25 We had talked about you being at the</p>	<p>1 A. She just helped me out a lot, but it was</p> <p>2 just a lot going on at the time.</p> <p>3 Q. Okay.</p> <p>4 A. Yes, ma'am.</p> <p>5 Q. Who is the "she" you're talking about?</p> <p>6 A. Ms. Darcelle, the owner of it.</p> <p>7 Q. Okay.</p> <p>8 A. It was just a lot.</p> <p>9 Q. Okay. And how long were you at House of</p> <p>10 Hope?</p> <p>11 A. For, like, eight months.</p> <p>12 Q. Okay.</p> <p>13 A. Yeah, like, eight, nine months.</p> <p>14 Q. Okay. And am I correct, either there or</p> <p>15 sometime during that period, perhaps you -- you got</p> <p>16 your GED? You passed the GED exam?</p> <p>17 A. (Witness indicating.)</p> <p>18 Q. Okay.</p> <p>19 A. Yes.</p> <p>20 Q. How did you first meet either</p> <p>21 Mr. Bouchard or the -- any of the other lawyers who</p> <p>22 are -- who have represented you in this case and in</p> <p>23 the case involving the Stone Mountain Inn?</p> <p>24 A. I met them through House of Hope.</p> <p>25 Q. Okay. And are there other -- to you</p>
Page 123	Page 125
<p>1 United Inn for two or three days in January of 2019.</p> <p>2 A. Uh-huh.</p> <p>3 Q. Were you going back and forth between</p> <p>4 there and the Stone Mountain Inn, or once you left --</p> <p>5 once you left the United Inn, then you went to Stone</p> <p>6 Mountain Inn?</p> <p>7 A. Yeah. Once we had left and we went to</p> <p>8 the Stone Mountain Inn.</p> <p>9 Q. Okay. Who is Henry Ingram? Is that Joc?</p> <p>10 A. That's Joc.</p> <p>11 Q. Okay. I want to ask you about House of</p> <p>12 Hope. How did you end up at House of Hope?</p> <p>13 A. So while they were holding me on those</p> <p>14 charges, they had to find me another placement --</p> <p>15 another CSEC home, and House of Hope was the one</p> <p>16 that -- you know, I told them my story or whatever,</p> <p>17 did my interview, they accepted me. That's how it</p> <p>18 happened.</p> <p>19 Q. Okay. And -- and so you were accepted</p> <p>20 into House of Hope, and this was in Brunswick?</p> <p>21 A. Uh-huh.</p> <p>22 Q. So you moved to Brunswick?</p> <p>23 A. Yes, ma'am.</p> <p>24 Q. Okay. And so tell me why you're crying</p> <p>25 when you talk about House of Hope.</p>	<p>1 knowledge, are there other House of Hope residents</p> <p>2 who -- well, first of all, let me ask you.</p> <p>3 What is House of Hope?</p> <p>4 A. It's a CSEC home for, you know, girls who</p> <p>5 experienced any type of sexual abuse, sex</p> <p>6 trafficking, rape, really anything of that nature.</p> <p>7 It's for girls who went through stuff like that.</p> <p>8 And, you know, it's like a CSEC home, so it's like a</p> <p>9 maximum -- I really wouldn't even say that because it</p> <p>10 really wasn't even like that. It was just a house</p> <p>11 that, like, helped girls recover.</p> <p>12 So it was therapy-based. We went to</p> <p>13 church every Sunday. We were active in the</p> <p>14 community. We had therapists. We had psychiatrists.</p> <p>15 We -- you know, stuff like that, but it was to help,</p> <p>16 you know, girls move on. Not even move on, but try</p> <p>17 to heal from stuff like that.</p> <p>18 Q. Was that a good experience for you; House</p> <p>19 of Hope?</p> <p>20 A. Yeah. I didn't have, like, any -- you</p> <p>21 know, it was like mixed, but it was good overall. It</p> <p>22 was just like a mental thing, but yeah, she was</p> <p>23 sweet. I love her. I still talk to them. I talk to</p> <p>24 everyone there still, but yeah.</p> <p>25 Q. Do you know other -- other girls who were</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 126..129**

Page 126	Page 128
<p>1 at House of Hope who are -- who are also represented</p> <p>2 by some of the lawyers that are representing you in</p> <p>3 the cases?</p> <p>4 A. No.</p> <p>5 Q. You don't know?</p> <p>6 A. No, ma'am.</p> <p>7 Q. Okay. What -- and what are you doing</p> <p>8 now? Are you in school? Are you working? Taking</p> <p>9 care of your baby? All of the above?</p> <p>10 A. No. Actually, I was in a phlebotomy</p> <p>11 class, but I ended up having to -- I don't want to</p> <p>12 say drop out, but that's exactly what I had to do.</p> <p>13 So it was a six-week program, and I was going through</p> <p>14 it through an ILP because I was still in DFCS' care</p> <p>15 at the time. I was just, you know, older than 18.</p> <p>16 So I was in an ILP, which is like an independent</p> <p>17 living.</p> <p>18 Q. Uh-huh.</p> <p>19 A. So I started a phlebotomy class. It was</p> <p>20 a six-week program. I made it to, like, week three,</p> <p>21 but then I didn't have transportation because I</p> <p>22 didn't have a car, so it was just real hard. And</p> <p>23 then I had a job at the time, so it was either work</p> <p>24 or go to -- you know, go to class. Of course, I'm</p> <p>25 going to pick work because I had, you know, like, a</p>	<p>1 Q. Did I hear you say somewhere in there</p> <p>2 you're -- you -- I don't know if it's House of Hope</p> <p>3 or a transitional home or something, but there's</p> <p>4 somebody else you're still giving -- you're giving</p> <p>5 money to?</p> <p>6 A. Oh. No, no, no, that's -- I was saying</p> <p>7 in the beginning --</p> <p>8 Q. Yes.</p> <p>9 A. -- like, when I was doing the phlebotomy</p> <p>10 class, I was in an ILP at that time.</p> <p>11 Q. Okay.</p> <p>12 A. I recently signed myself out of care, but</p> <p>13 even before I signed myself out of care, I was</p> <p>14 already living on my own, like, two months prior to</p> <p>15 that. So I wasn't giving nobody money anymore. I</p> <p>16 was paying my own rent, and they were, like, going</p> <p>17 half in with me on my rent because they do stuff like</p> <p>18 that.</p> <p>19 Q. But not any -- not anymore?</p> <p>20 A. No, not anymore because I signed myself</p> <p>21 out. Yeah, and I aged out now. So that's that.</p> <p>22 But, you know, I still have -- like, if I need</p> <p>23 resources and stuff, I still have resources.</p> <p>24 Q. And where is Londyn -- Londyn now?</p> <p>25 A. With my aunt. I actually filed for</p>
Page 127	Page 129
<p>1 phone bill. I still had to give them money, like, to</p> <p>2 save, like, stuff like that.</p> <p>3 So I ended up dropping out of the class,</p> <p>4 and I was working, but now I just do hair. Well,</p> <p>5 I'm -- I'm not going to say it like that. I still</p> <p>6 work because I'm not going to -- like, it takes up a</p> <p>7 lot of my time, but I do hair and I sell hair.</p> <p>8 Q. Okay. Is -- and are you working doing</p> <p>9 some other job as well?</p> <p>10 A. No, ma'am. Like, it pays really well.</p> <p>11 Q. Okay. Do you work for a salon, or you</p> <p>12 work for yourself?</p> <p>13 A. No. I work for myself. I did lashes too</p> <p>14 at a point in time, and I was working in a suite, but</p> <p>15 I just re-branded into hair, so I don't really have a</p> <p>16 whole bunch of clients the way that I had lash</p> <p>17 clients if that makes sense. So I am not in a suite</p> <p>18 yet. I'm doing it out of my house.</p> <p>19 Q. Okay.</p> <p>20 A. But when I do get to that point where</p> <p>21 it's, like, I expand and there's like a lot of</p> <p>22 different type of people, then, yeah, I do plan on</p> <p>23 moving to a suite then for my privacy. But not right</p> <p>24 now, no, because it's -- no, I don't think it would</p> <p>25 be worth it right now.</p>	<p>1 temporary -- I'm sorry, my auntie has temporary</p> <p>2 guardianship. I filed for return -- no, it's called</p> <p>3 termination of guardianship. I'm sorry. So return</p> <p>4 of custody, basically. So I just did that, but she's</p> <p>5 still staying with my auntie right now.</p> <p>6 Q. Okay. But your goal is to -- to --</p> <p>7 A. Uh-huh. Because I do --</p> <p>8 Q. Regain --</p> <p>9 A. Custody.</p> <p>10 Q. -- custody?</p> <p>11 A. Yes, ma'am. Because I do get her more</p> <p>12 often now. Like, me and my aunt used to butt heads a</p> <p>13 lot after, like, all of this had happened. It took a</p> <p>14 toll on, like, family relationships, but especially</p> <p>15 when it came to my little girl. But, you know,</p> <p>16 everything's going good now so I get her more often.</p> <p>17 I see her more often.</p> <p>18 Q. Okay. I am going to show you some photos</p> <p>19 just so I can have a record of what -- what we're</p> <p>20 looking at. Okay. That's going to be Exhibit 1.</p> <p>21 (Defendant's Exhibit No. 1 was marked</p> <p>22 for identification.)</p> <p>23 BY MS. RICHENS:</p> <p>24 Q. I want to have you take a look at that.</p> <p>25 Are you familiar with that picture?</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 130..133**

Page 130	Page 132
<p>1 A. Uh-huh.</p> <p>2 Q. Can you tell me -- is that you in the</p> <p>3 photo?</p> <p>4 A. Yes, ma'am.</p> <p>5 Q. Okay. And this -- it looks like it has a</p> <p>6 date of November 22nd, 2018.</p> <p>7 A. Uh-huh.</p> <p>8 Q. Would that -- would you expect that, that</p> <p>9 would be the date that this -- this was actually</p> <p>10 taken?</p> <p>11 A. No. This probably just when I posted it</p> <p>12 on the 22nd. But it was -- I know for a fact it was</p> <p>13 around this time, though, yes, ma'am.</p> <p>14 Q. Okay. And that's you?</p> <p>15 A. Uh-huh.</p> <p>16 Q. And who is this in the photo with you?</p> <p>17 A. That's Cash.</p> <p>18 Q. Okay. And where was this taken?</p> <p>19 A. At the other -- where was this? I told</p> <p>20 you Cash sells drugs and stuff.</p> <p>21 Q. I'm sorry. Say that again.</p> <p>22 A. I told you Cash sells drugs. So he used</p> <p>23 to, like, re-up at -- I'm trying to think of the name</p> <p>24 of the other hotel, but it's another hotel on</p> <p>25 Memorial Drive. The hotel that I was talking about</p>	<p>1 This next one is Exhibit 2.</p> <p>2 (Defendant's Exhibit No. 2 was marked</p> <p>3 for identification.)</p> <p>4 BY MS. RICHENS:</p> <p>5 Q. I will ask you to take a look at that.</p> <p>6 A. Okay.</p> <p>7 Q. Are you familiar with that image?</p> <p>8 A. Yes, ma'am.</p> <p>9 Q. Is that you in the picture?</p> <p>10 A. Yes, ma'am.</p> <p>11 Q. Okay. And what -- what is this a photo</p> <p>12 of?</p> <p>13 A. Me at the United Inn smoking a blunt.</p> <p>14 Smoking marijuana.</p> <p>15 Q. And the date on the -- is this just a</p> <p>16 photograph? This isn't a video or anything?</p> <p>17 A. No, it was a video. But if I was to save</p> <p>18 the video, it wouldn't have, like, the time stamp on</p> <p>19 it anymore so I had to take a screenshot for the</p> <p>20 timestamp.</p> <p>21 Q. Okay. But if somebody wanted the video,</p> <p>22 do you still have the video?</p> <p>23 A. Yes, ma'am.</p> <p>24 Q. Okay. And is this -- the -- the</p> <p>25 timestamp is October 16th, 2018. Is that when this</p>
Page 131	Page 133
<p>1 we went to after he had got locked up, but he had a</p> <p>2 plug at the hotel as well.</p> <p>3 Q. What's a plug?</p> <p>4 A. The person, like, he would buy his drugs</p> <p>5 from to sell his drugs.</p> <p>6 Q. Okay.</p> <p>7 A. So, like, we would go with him to the</p> <p>8 plug's room to, like, do stuff with the plug too, so</p> <p>9 this was in the plug's room at the time.</p> <p>10 Q. Okay.</p> <p>11 A. It was on Memorial Drive, but it was not</p> <p>12 at the United Inn at the time.</p> <p>13 Q. Okay. And this -- was this -- do you</p> <p>14 know where this money came from?</p> <p>15 A. Yeah. Us. Me, Mini, and drugs. Well,</p> <p>16 Cash selling drugs.</p> <p>17 Q. Are you saying you were selling drugs or</p> <p>18 this is the money from you -- you and Mini --</p> <p>19 A. Yes.</p> <p>20 Q. -- trafficking --</p> <p>21 A. Yes, ma'am.</p> <p>22 Q. -- plus drugs?</p> <p>23 A. Yes, ma'am.</p> <p>24 Yes. That's exactly what I am saying.</p> <p>25 Q. Okay. Okay. All right. All right.</p>	<p>1 was taken?</p> <p>2 A. Yes, ma'am.</p> <p>3 Q. Okay. And are you wearing a gas mask?</p> <p>4 A. Yes, ma'am.</p> <p>5 Q. Where did you get a gas mask?</p> <p>6 A. It was -- who was I with -- it was King's</p> <p>7 gas mask.</p> <p>8 Q. Okay. And what is this black and yellow?</p> <p>9 A. One second.</p> <p>10 Q. Oh, sure.</p> <p>11 A. Okay. I'm sorry.</p> <p>12 Q. What is this black-and-yellow cord? Do</p> <p>13 you see that? This thing here.</p> <p>14 Do you know what that is?</p> <p>15 A. To be honest, I don't know. It was</p> <p>16 probably like a phone charger.</p> <p>17 Q. Okay. And this was in a room at the</p> <p>18 United Inn?</p> <p>19 A. Yes, ma'am.</p> <p>20 Q. All right. And is there any particular</p> <p>21 purpose of taking this photo?</p> <p>22 A. No, not really. No.</p> <p>23 Q. Okay. What does this mean, "If y'all</p> <p>24 don't stop DM'ing me. WTF"?</p> <p>25 A. Honestly, I don't even remember. I could</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 134..137**

Page 134	Page 136
<p>1 have been talking about a lot, though, but I don't</p> <p>2 even remember.</p> <p>3 Q. Okay. All right. Here is Exhibit No. 3.</p> <p>4 (Defendant's Exhibit No. 3 was marked</p> <p>5 for identification.)</p> <p>6 THE WITNESS: All right.</p> <p>7 MS. RICHENS: Here you go.</p> <p>8 MR. BOUCHARD: Thank you.</p> <p>9 BY MS. RICHENS:</p> <p>10 Q. All right. And tell me what this is a</p> <p>11 picture of.</p> <p>12 A. It's a screenshot of my messages.</p> <p>13 Q. On your phone?</p> <p>14 A. Uh-huh.</p> <p>15 Q. Okay. And the date -- the only date I</p> <p>16 see on here is November 2, 2018.</p> <p>17 A. Uh-huh.</p> <p>18 Q. Would that be an accurate date of when</p> <p>19 this communication was going on?</p> <p>20 A. Uh-huh.</p> <p>21 Q. And who is Heartless?</p> <p>22 A. It's one of the guys who Cash used to</p> <p>23 have. When I said "Cash used to have," like, three</p> <p>24 men with him, this is one of them.</p> <p>25 Q. Okay. And why is this upsetting you?</p>	<p>1 Q. Okay. Okay. I'm going to give you</p> <p>2 No. 4 -- Exhibit No. 4.</p> <p>3 (Defendant's Exhibit No. 4 was marked</p> <p>4 for identification.)</p> <p>5 MS. RICHENS: Give one to your lawyer.</p> <p>6 BY MS. RICHENS:</p> <p>7 Q. All right. And what is Exhibit 4?</p> <p>8 A. I was up working.</p> <p>9 Q. This is you in this image?</p> <p>10 A. Yes, ma'am.</p> <p>11 Q. Okay.</p> <p>12 A. With King. I was just high and working,</p> <p>13 like, I guess, I just posted a picture --</p> <p>14 Q. Okay.</p> <p>15 A. -- with me being up.</p> <p>16 Q. Okay. Working, meaning working for King?</p> <p>17 A. Yeah.</p> <p>18 Q. Okay. And the date here is October 8th,</p> <p>19 2018. Is that -- do you believe that's an accurate</p> <p>20 date?</p> <p>21 A. I actually feel it was the -- the 7th</p> <p>22 because the time says 5:50 p.m., which means that</p> <p>23 this is the time that I took it, but when it say</p> <p>24 8:55, that just means that's the time that I actually</p> <p>25 posted it.</p>
Page 135	Page 137
<p>1 A. It's not. It just brings back memories,</p> <p>2 but I am not upset, though.</p> <p>3 Q. Okay. It's nothing particular about</p> <p>4 this, though, is that -- am I correct or is it?</p> <p>5 A. I'm just remembering, you know.</p> <p>6 Q. Okay.</p> <p>7 A. But no.</p> <p>8 Q. Okay. That's what I wanted to know.</p> <p>9 So what -- can you tell me what's going</p> <p>10 on in this -- so -- and are you -- who are you? Are</p> <p>11 you the one that says, "Come to the United Inn,</p> <p>12 room 145. Cash and Mini in here"?</p> <p>13 A. Uh-huh.</p> <p>14 Q. Okay. And so what -- what was happening,</p> <p>15 if you recall, in this back-and-forth?</p> <p>16 A. We had switched rooms, again, so he was</p> <p>17 asking, like, what room were we in, because I think</p> <p>18 he left to go do something. I don't remember. And</p> <p>19 then he was trying to come back, but he didn't know</p> <p>20 what room we were in.</p> <p>21 Q. Okay.</p> <p>22 A. So Cash said tell Mini what room we're</p> <p>23 in.</p> <p>24 Q. Okay.</p> <p>25 A. So that's what that was.</p>	<p>1 Q. Okay.</p> <p>2 A. So if it was 5:50 a.m., I feel like it</p> <p>3 was the previous day, but I -- if that makes sense,</p> <p>4 but I had posted it the next day.</p> <p>5 Q. How do you know that's a.m. as opposed to</p> <p>6 p.m.?</p> <p>7 A. Right here. (Witness indicating.)</p> <p>8 You've got to, like, look real close,</p> <p>9 though.</p> <p>10 Q. I see.</p> <p>11 Okay. So that's the -- that's the</p> <p>12 time -- is that the time, 5:50?</p> <p>13 A. Yes, ma'am.</p> <p>14 Q. And what is, "Hey, big head"?</p> <p>15 A. Just a saying --</p> <p>16 Q. Okay.</p> <p>17 A. -- I guess.</p> <p>18 Q. And where was this taken?</p> <p>19 A. At the United Inn.</p> <p>20 Q. Okay. All right. Okay. Let me give you</p> <p>21 Exhibit No. 5.</p> <p>22 (Defendant's Exhibit No. 5 was marked</p> <p>23 for identification.)</p> <p>24 BY MS. RICHENS:</p> <p>25 Q. And will you tell me, please, what</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 138..141**

Page 138	Page 140
<p>1 Exhibit No. 5 is?</p> <p>2 A. It's a video of me at the United Inn as</p> <p>3 well.</p> <p>4 Q. Okay.</p> <p>5 A. In the restaurant. I guess I made a</p> <p>6 video in the restroom.</p> <p>7 Q. Okay. Is this in a room at the United --</p> <p>8 a guest room at the United Inn?</p> <p>9 A. Yes. This is in one of the rooms we were</p> <p>10 staying in, but I made the video, like, in the</p> <p>11 restroom in the room.</p> <p>12 Q. Okay. And do you think this date is --</p> <p>13 is approximately correct, October 24th, 2018?</p> <p>14 A. Yes, ma'am.</p> <p>15 Q. Okay. And is there any -- and this is a</p> <p>16 video you said?</p> <p>17 A. Well, it's not like a full video. It's</p> <p>18 like a boomerang. So, you know, it's kind of, like,</p> <p>19 a loop.</p> <p>20 Q. Okay.</p> <p>21 A. That's what it was.</p> <p>22 Q. Okay. And it -- was there a purpose of</p> <p>23 this? Like, did you use this picture for something,</p> <p>24 or you just took it to take it?</p> <p>25 A. No. I didn't use this for anything, so</p>	<p>1 Okay?</p> <p>2 A. Uh-huh. Yes, ma'am.</p> <p>3 Q. Okay. And this video is Bates-stamped</p> <p>4 JG00172. I'm going to show you the video, and then</p> <p>5 I'm going to ask you some questions about it.</p> <p>6 Okay?</p> <p>7 Is that all right?</p> <p>8 A. (Witness indicating.)</p> <p>9 Q. Okay. Let me --</p> <p>10 MS. RICHENS: And, David, do you -- do</p> <p>11 you need to see this, or you know what</p> <p>12 video this is?</p> <p>13 MR. BOUCHARD: Yeah, I'll watch it.</p> <p>14 MS. RICHENS: Okay.</p> <p>15 (An item was displayed for all parties to</p> <p>16 view.)</p> <p>17 BY MS. RICHENS:</p> <p>18 Q. Okay. I'm going to ask you some</p> <p>19 questions about it.</p> <p>20 Do you need to see it again, or are</p> <p>21 you -- you're familiar with this video?</p> <p>22 A. Uh-huh.</p> <p>23 Q. Okay. Is -- is that you in that video?</p> <p>24 A. Yes, ma'am.</p> <p>25 Q. And where was that taken?</p>
Page 139	Page 141
<p>1 yeah.</p> <p>2 Q. And it says sound on. Is there music --</p> <p>3 was there music or something to this? Or what does</p> <p>4 that mean?</p> <p>5 A. No. I think it was just me putting a tag</p> <p>6 on it or something.</p> <p>7 Q. Okay.</p> <p>8 A. Because it wasn't, like, a -- an actual</p> <p>9 video. It was just like a boomerang, so which means</p> <p>10 it, like, had no sound or nothing.</p> <p>11 Q. Okay. So that's just a little tag --</p> <p>12 A. Yes, ma'am.</p> <p>13 Q. -- on there?</p> <p>14 Okay. And you just took the picture to</p> <p>15 take the picture?</p> <p>16 A. (Witness indicating.)</p> <p>17 Q. Yes?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. All right. Okay.</p> <p>20 MS. RICHENS: So that I don't have to</p> <p>21 move, would you mind just -- thank you.</p> <p>22 BY MS. RICHENS:</p> <p>23 Q. All right. Ms. Grimes, I want to show</p> <p>24 you a video that -- that your lawyer provided me.</p> <p>25 Hopefully, I can pull it up. Give me one second.</p>	<p>1 A. The United Inn.</p> <p>2 Q. Okay. And was that taken on your phone?</p> <p>3 A. Uh-huh.</p> <p>4 Q. Okay. And was there a particular purpose</p> <p>5 for taking the video?</p> <p>6 A. Cash had wanted the -- he asked me to</p> <p>7 send him a video. Like, I don't remember exactly,</p> <p>8 like, what it was, but it was like send him a video,</p> <p>9 like, showing my body basically. So that's what the</p> <p>10 video was. A video of me, like, showing my body.</p> <p>11 Q. All right. And -- and it was at the</p> <p>12 United Inn in a -- in a room?</p> <p>13 A. Yes, ma'am.</p> <p>14 Q. Is it -- was it a room where you were --</p> <p>15 where you were working or staying or?</p> <p>16 A. Uh-huh. It was one of the rooms, yes.</p> <p>17 Q. Okay.</p> <p>18 A. At the time, yes.</p> <p>19 Q. And I apologize if I asked you this, the</p> <p>20 date, I think, was October 25th, 2018.</p> <p>21 A. Yes, ma'am.</p> <p>22 Q. Did you put that date on there, or did</p> <p>23 someone else put that date on there?</p> <p>24 A. No. I put -- the original video, it</p> <p>25 didn't have the data. It was just a video. I put</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 142..145**

Page 142	Page 144
<p>1 the timestamp on the date so that when I sent him the</p> <p>2 video, he would be able to see, like, what the date</p> <p>3 on the video was.</p> <p>4 Q. Okay. And I'm talking about that</p> <p>5 little --</p> <p>6 A. The October --</p> <p>7 Q. Yeah, right in the middle.</p> <p>8 A. Yes, ma'am.</p> <p>9 Q. Okay. So you put that on there so he</p> <p>10 would see it?</p> <p>11 A. Yes, ma'am.</p> <p>12 Q. All right.</p> <p>13 MS. RICHENS: Let's take a break. I'm</p> <p>14 going to check my notes, and we may be</p> <p>15 about finished.</p> <p>16 Okay?</p> <p>17 THE WITNESS: All right.</p> <p>18 THE VIDEOGRAPHER: Stand by.</p> <p>19 The time is 2:06 p.m., and we are now</p> <p>20 off the record.</p> <p>21 (Whereupon, the video camera was</p> <p>22 turned off.)</p> <p>23 (A short recess was taken.)</p> <p>24 (Whereupon, the video camera was</p> <p>25 turned on.)</p>	<p>1 like, late 20s, early 30s, if even that, maybe.</p> <p>2 Well, no, I think he was kind of -- yeah, like, late</p> <p>3 20s, early 30s.</p> <p>4 Q. Okay.</p> <p>5 A. I don't have like an exact age, no.</p> <p>6 Q. Okay. The other thing I wanted to do is</p> <p>7 your lawyer gave me a list of potential witnesses,</p> <p>8 I'm going to call them, and I just want to read them</p> <p>9 to you and tell me if you know who they are.</p> <p>10 A. Yes, ma'am.</p> <p>11 Q. Okay. So you're Jhordyn Grimes,</p> <p>12 obviously. Claudette Grimes, I think we talked about</p> <p>13 is that your -- your auntie.</p> <p>14 A. Uh-huh.</p> <p>15 Q. Okay.</p> <p>16 A. I mean, yes, ma'am.</p> <p>17 Q. Keisha Grimes?</p> <p>18 A. That's a cousin. One of my cousins.</p> <p>19 Q. Okay. What -- what information would --</p> <p>20 does Keisha have that's related to your sex</p> <p>21 trafficking or -- or maybe -- I don't know.</p> <p>22 Do you know why she's listed here?</p> <p>23 A. Yes. Because during the time when I had</p> <p>24 went back to a group home, I did visit back home,</p> <p>25 like, after they had took me from out of the hotel</p>
Page 143	Page 145
<p>1 THE VIDEOGRAPHER: This is the</p> <p>2 beginning of Media No. 5. The time is</p> <p>3 2:23 p.m., and we are on the record.</p> <p>4 BY MS. RICHENS:</p> <p>5 Q. All right. Ms. Grimes, we're going to go</p> <p>6 for a few more minutes, and then we'll be done. I</p> <p>7 appreciate your -- your -- your participation today</p> <p>8 and your --</p> <p>9 A. Yes, ma'am.</p> <p>10 Q. -- candid and thoughtful answers. I</p> <p>11 really do.</p> <p>12 A. Yes, ma'am.</p> <p>13 Q. Before we forget, and just for the</p> <p>14 record, the -- the video that we looked at is going</p> <p>15 to be designated as Exhibit 6 to your deposition.</p> <p>16 (Defendant's Exhibit No. 6 was marked</p> <p>17 for identification.)</p> <p>18 BY MS. RICHENS:</p> <p>19 Q. Another question I wanted to ask you, do</p> <p>20 you know about how old Cash and King were at the time</p> <p>21 of -- you know, in 2018/2019 when this was going on?</p> <p>22 A. No, ma'am. I actually, like, don't know</p> <p>23 none of their ages, but I know that King was older.</p> <p>24 Like, Cash was older too, but, like, King was</p> <p>25 probably like 40 something. Cash I would say maybe,</p>	<p>1 and put me in another group home. I had -- you know,</p> <p>2 they let you do, like, home visits and stuff.</p> <p>3 Q. Uh-huh.</p> <p>4 A. So at one point, I visited back home and</p> <p>5 I had, like, marks all on me, but it was from when I</p> <p>6 was previous -- previously in the hotel, and my</p> <p>7 cousin is the one who pointed it out, so I'm guessing</p> <p>8 that's what she's on there too.</p> <p>9 Q. You had marks on you?</p> <p>10 A. Yeah. Like, I had burn marks and stuff</p> <p>11 on me.</p> <p>12 Q. What are those from?</p> <p>13 A. From King.</p> <p>14 Q. Okay. You -- you said he had been</p> <p>15 violent with you. Is that -- did he burn you with</p> <p>16 cigarettes?</p> <p>17 A. Yeah. Like, lighters, cigarettes,</p> <p>18 blunts, whatever, like, you know -- yeah.</p> <p>19 Q. Okay. And where -- where did that</p> <p>20 happen?</p> <p>21 A. It was on my neck actually when she had</p> <p>22 pointed it out, but --</p> <p>23 Q. Okay.</p> <p>24 A. -- I am not sure if she's on there</p> <p>25 because of that or just because of -- she, like, knew</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 146..149**

Page 146	Page 148
<p>1 what was going on. Because they knew what was going</p> <p>2 on. Like, they used to try to say it themselves,</p> <p>3 like, what was happening with me. So I am guessing</p> <p>4 that's why she's on there.</p> <p>5 Q. Okay. Shameka Grimes?</p> <p>6 A. That's one of my cousins as well.</p> <p>7 Q. Okay.</p> <p>8 A. She knew too. You know, my -- the Grimes</p> <p>9 side of my family is kind of real tight. So one</p> <p>10 knows, like, everybody kind of --</p> <p>11 Q. And are you saying that while this was</p> <p>12 going on, they knew about it or --</p> <p>13 A. So my -- no, my auntie and my cousin</p> <p>14 Keisha.</p> <p>15 Q. Uh-huh.</p> <p>16 A. While it was going on, they -- they knew</p> <p>17 about it, but -- or they kept suspecting it because</p> <p>18 they were saying it, like, not to me, though, but to</p> <p>19 other people. Like, that's why I had sent a</p> <p>20 screenshot of, like, a message a girl had sent me on</p> <p>21 Instagram and in the message she was telling me,</p> <p>22 like, "I know you're in an unsafe place. I had seen</p> <p>23 you" and stuff like that.</p> <p>24 She's one of -- she's not on here,</p> <p>25 though, because we didn't have her actual name, but,</p>	<p>1 A. Yes, ma'am.</p> <p>2 Q. Okay. Okay. Sonya Madison, it says, was</p> <p>3 your house mother at House of Hope?</p> <p>4 A. Uh-huh.</p> <p>5 Q. The House of Hope staff?</p> <p>6 Kevy we talked about.</p> <p>7 A. Uh-huh.</p> <p>8 Q. Kimani we talked about. King and Cash we</p> <p>9 talked about.</p> <p>10 Who is Keiron Perry? Are they --</p> <p>11 A. I think -- well, so these -- well, this</p> <p>12 is Cash as well.</p> <p>13 Q. So End- -- Endco Corey Forest is Cash?</p> <p>14 A. Uh-huh.</p> <p>15 Q. We talked about that.</p> <p>16 A. So these are both Cash.</p> <p>17 Q. Okay.</p> <p>18 A. But these two people, they were -- these</p> <p>19 were the men who were in the room as well. These</p> <p>20 were two of them.</p> <p>21 Q. Are these other associates of Cash's?</p> <p>22 A. Yes, ma'am.</p> <p>23 Q. Okay. That's Keiron Perry and Quinton</p> <p>24 Antwan Bush?</p> <p>25 A. Yes, ma'am.</p>
Page 147	Page 149
<p>1 like, that's just an example of, like -- you know,</p> <p>2 like, I was on Memorial Drive. People were seeing</p> <p>3 me, like, I was out there.</p> <p>4 Q. Uh-huh.</p> <p>5 A. Like -- so yeah.</p> <p>6 Q. Okay. We talked about Chonty Clarke.</p> <p>7 When's the last time you spoke to her?</p> <p>8 A. Last year. It was sometime last year.</p> <p>9 Q. Do you know what she's doing now?</p> <p>10 A. I actually don't.</p> <p>11 Q. Okay.</p> <p>12 A. I wish I did.</p> <p>13 Q. What's this name here?</p> <p>14 A. Deanshanaye. That's -- that's the -- the</p> <p>15 one I labeled "Naynay."</p> <p>16 Q. Oh, okay. Yes.</p> <p>17 A. Uh-huh. That's Naynay.</p> <p>18 Q. All right. And do you know why she's --</p> <p>19 what information would -- do -- would you expect her</p> <p>20 to have about your trafficking?</p> <p>21 A. So the second time we had went to the</p> <p>22 United Inn, she was one of the people who were with</p> <p>23 me.</p> <p>24 Q. Was she trafficked with you at the United</p> <p>25 Inn?</p>	<p>1 Q. Okay. Who is Alyssa Griffin?</p> <p>2 A. I don't know.</p> <p>3 Q. Okay. Do you know Genesis Wilson?</p> <p>4 A. No.</p> <p>5 Q. Do you know Zaccheus Obie?</p> <p>6 A. No.</p> <p>7 Q. Do you know Quintavious Obie?</p> <p>8 A. No, ma'am.</p> <p>9 Q. Do you know Kikia Anderson?</p> <p>10 A. No, ma'am.</p> <p>11 Q. Do you know Dontavis Lamar Carr?</p> <p>12 A. No.</p> <p>13 Q. Okay. And then I think the all -- the</p> <p>14 others are all -- there's a description of who they</p> <p>15 are.</p> <p>16 A. Okay.</p> <p>17 Q. All right. I have nothing further for</p> <p>18 you today. So we can go off the record.</p> <p>19 THE VIDEOGRAPHER: Stand by.</p> <p>20 The time is 2:30 p.m. This is the end</p> <p>21 of Media No. 5, and we are off the record.</p> <p>22 (Whereupon, the video camera was</p> <p>23 turned off.)</p> <p>24 (Whereupon off the record, the witness</p> <p>25 waived the right to read, review, and sign</p>

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Pages 150..151****Page 150**

1 the transcript of the above proceedings.)
 2 (The videotaped deposition of J.G. concluded at
 3 2:30 p.m. on February 8, 2023.)
 4
 5
 6
 7
 8
 9
 10
 11
 12
 13
 14
 15
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

Page 151

1 CERTIFICATE
 2 STATE OF GEORGIA
 3 COUNTY OF FULTON
 4
 5 I, Christopher J. Tomko, Certified Court
 6 Reporter, certify that the foregoing transcript is
 7 a true, correct, and complete record of the
 8 testimony given by the deponent, J.G., who was
 9 first duly sworn by me; that I am not a relative,
 10 employee, attorney, or counsel of any of the
 11 parties; nor financially interested in the action;
 12 that the said deponent and counsel in the presence
 13 of each other and before me and waived the reading
 14 and signing of the deposition; and the original
 15 deposition under seal shall be filed with the court
 16 by the attorney taking the deposition.
 17 This certificate is expressly withdrawn
 18 and denied upon disassembly and/or photocopying of
 19 the foregoing transcript, or any portion thereof,
 20 unless such disassembly or photocopying is done by
 21 the undersigned Certified Court Reporter and
 22 original signature and official seal is attached
 23 hereto.
 24 WITNESS my hand and seal at FULTON County,
 25 GEORGIA, this, the 8th day of FEBRUARY 2023.

Christopher Tomko

Christopher J. Tomko
 Certified Court Reporter
 Georgia License No. 4802-6210-2922-0352

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: 1..8th**

Exhibits	1:20-cv-05233-mlb	2019	35:22	4
	8:12	37:22	38:1	
J.G.-1 7:5	1:24 108:18	40:1,13		4 108:17
129:20,21	1st 16:25	63:20		136:2,3,7
J.G.-2 7:6		64:25 66:9		
132:1,2	2	119:13,23		40 143:25
J.G.-3 7:8		120:2		40s 115:1
134:3,4	2 41:7	122:11		
J.G.-4 7:9	75:19	123:1		5
136:2,3,7	132:1,2	2020 39:3		
J.G.-5 7:11	134:16	2023 8:2,13		5 137:21,22
137:21,22	20 14:18	20s 144:1,3		138:1
138:1	20- 39:3	21 14:15,18		143:2
	40:1 66:8	22nd 130:6,12		149:21
1	2002 14:17	230 14:12		5:50 136:22
	2018 17:6,7	24/7 55:5		137:2,12
1 8:8 40:24	20:9,18,24	24th 138:13		6
129:20,21	22:10	25th 141:20		
10:00 8:2	23:25	28th 14:17		6 143:15,16
10:05 8:14	24:24	2:06 142:19		
10:43 40:23	33:22 34:1	2:23 143:3		7
10:55 41:8	39:2,3,13	2:30 149:20		
11:39 75:19	40:13			70 115:8
11:51 76:3	41:21			7th 20:7
12 56:1	43:15,18			24:24
79:19	44:7 45:3,24 66:8			29:24 30:5
12:31 108:10	71:12	3		45:24
145 135:12	130:6			136:21
16 17:10	132:25	3 76:2		8
115:5	134:16	134:3,4		
16th 132:25	136:19	30316 14:13		8 8:2,13
18 126:15	138:13	30s 115:1		8:55 136:24
	141:20	144:1,3		8th 20:7
	2018/2019			24:24
	143:21			29:24 30:5

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: a.m...back**

45:24	57:4 78:9	141:19	Atlanta
136:18	address	approach	14:12 16:9
	14:11	84:19	attention
A	ads 51:18	approached	83:23
a.m. 8:2,14	57:2,13	47:17	attorney
40:23 41:8	82:6	approximately	70:24
75:19 76:3	afternoon	20:19 61:6	attorneys
137:2,5	108:20,21	138:13	10:14
Absolutely	age 113:11	area 16:9	August 21:3
40:18,20	144:5	49:8	22:10
abuse 125:5	aged 128:21	arrangements	23:24
abused 42:12	ages 143:23	57:5	aunt 15:2,
accepted	ahead 43:12	arrested	12 18:1
123:17,19	allegations	34:5,8	128:25
accurate	18:7	61:11 63:8	129:12
134:18	Alyssa 149:1	68:21,22	aunt's 15:4
136:19	ambulance	69:2,4,7	auntie 22:5
accurately	109:6,7	70:15	39:8,22
13:17	Anderson	71:22	129:1,5
accusation	149:9	108:25	144:13
121:17	answers	119:13	146:13
active	143:10	arrived	awake 73:12
125:13	Antwan 70:4	32:10	aware 122:5
actively	148:24	45:25	
109:23	anymore 67:2	80:22	B
activity	128:15,19,	ashtray 71:9	baby 48:20,
53:7 109:4	20 132:19	associate	21 50:17
actual 26:12	anyplace	97:11	53:19 83:6
74:14,15	18:16	associates	119:3,4,7
113:10	anytime	76:10 77:1	126:9
139:8	113:18	84:13,16	back 20:13
146:25	apologize	94:15 95:7	29:2
ad 51:11,12		107:4	35:17,25
		148:21	37:13

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: back-and-forth..Brunswick**

41:12,25	141:9	93:1 94:18	40:19
42:4,5	Bates-stamped	99:6,10	42:21 44:4
43:13	140:3	100:11	124:21
46:5,10,11		101:25	134:8
61:14 64:2	beat 76:23	102:18,20	140:13
69:25	109:6	114:17,25	bought 99:21
71:3,23	bedsheets	116:13	
80:18	82:16	133:8	boy 36:1,8
97:21			43:5 64:4
98:14 99:5	beginning	black-and-	121:12
102:4	8:8 41:7	yellow	
113:11	76:2	133:12	break 14:1,5
119:1	108:17		40:16
122:13	122:2	blatant 93:9	41:12
123:3	128:7	114:8	49:16
135:1,19	143:2	blunt 132:13	70:18
144:24	behalf 8:23	blunts	75:17
145:4	9:2 10:14	145:18	86:21
	27:10	body 85:12	111:17
back-and-forth		141:9,10	142:13
135:15	big 60:2		breaks 13:25
backside	137:14	Bond 8:15	14:2
46:15 51:5	bill 14:12	10:2	bring 11:23
52:17	71:19	boomerang	46:20
56:18	127:1	138:18	89:25
		139:9	
bad 48:1	biological	born 14:23	brings 18:3
106:21	17:12	17:5	135:1
barely 83:21	birthday		broom 89:23
84:21 85:6	14:16,20	bother 94:12	brother 16:5
86:4	16:24 17:3	bothered	
based 112:20	bit 31:23	31:14	brothers
basically	43:14	bottle 89:23	16:2,3,7
10:4 32:23	53:24	bottom 65:6	brought
71:24	69:13		11:22 12:2
84:20	95:14	Bouchard	64:6 67:17
105:15	106:11	8:22,23	118:11
129:4	black 92:16	10:1 12:19	Brunswick

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: bunch..charge**

123:20,22	59:19	11:22,24	12,15
bunch 56:19	73:22	12:22,23,	97:6,9,11
127:16	75:5,6	25 13:6	99:7,8,15,
	103:19	18:11	17,21,24
burn	104:15,17	80:17	100:2
145:10,15	105:3,17,	124:22,23	102:1,10
Bush 70:4	18 109:7	cases 126:3	103:1
148:24	129:2		104:2,5,13
butt 129:12	camera 8:5	cash 28:4,	106:21
	41:1,4	5,19,21	107:13
buy 82:11	75:21,24	29:10	108:25
94:20	108:11,14	31:16	109:6,9
96:15,16	142:21,24	32:6,7	117:25
97:2 99:7,	149:22	34:5,15	118:5
15,17		35:15	130:17,20,
100:1	candid	36:21	22 131:16
102:1	143:10	37:4,10	134:22,23
131:4	car 56:16,	52:4 54:9,	135:12,22
buying	18 78:17	11 60:10,	141:6
100:17,25	79:3,5,13,	12 61:3,	143:20,24,
101:1	18,20	20,24	25 148:8,
107:12	80:9,21,25	62:1,15,23	12,13,16
	81:4,6,9	63:7,10,12	
<hr/>	109:19,20,	68:22	Cash's 35:13
c	25 110:3,	69:12	84:12,16
	4,7 111:3,	70:6,7,14	94:15
C-A-S-H 28:7	4 126:22	71:22 72:8	148:21
call 18:4	care 39:8	73:19	caused 34:4
55:16,17,	94:13	74:19,22,	37:22,25
18 56:11	126:9,14	25 76:9,20	cell 68:2
74:3 83:3,	128:12,13	77:1 78:17	change 90:3,
12 84:3		80:1	17
86:1	cared 50:3	82:19,21	changed
103:11	Carr 149:11	83:25 84:9	90:13
104:16	carry 76:12	86:13,14	93:19
118:19,20	cars 57:11	93:10,22	charge
144:8	case 8:11	94:7,14,19	121:24
called 9:15		95:6 96:4,	

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: charged..cop**

charged	class	colors 74:11	66:10,15
121:25	126:11,19,	comfortable	67:3 71:6
charger	24 127:3	78:14	confiscated
133:16	128:10	79:12	68:20
charges	Claudette	80:13	confuse 33:3
122:8	15:5	commenced	confused
123:14	144:12	8:1	54:14 64:9
check 29:5	clean 88:5,	common 94:3	consistent
31:16,17	6,19 89:6,	113:4	79:23
46:25 62:1	7,20,22	communication	contact 29:7
102:3,4,8	cleaned	134:19	64:16,17
107:17,20,	90:14	community	66:25 67:1
22 142:14	91:19	125:14	68:2,8
child 39:9	cleaning	company 9:15	contend
children	90:4 91:9	conceived	18:13
16:13	clear 59:9	17:19	context
Chonty 67:9	client 10:15	concept	10:19
119:13	18:4	82:20	conversating
120:9,25	clients	concluded	91:16
121:3	127:16,17	11:17,18	conversation
122:1,10,	close 21:15	conclusion	48:16
17 147:6	137:8	116:8	103:10
choose 27:21	clothes	condom 97:2	conversations
Chris 8:16	83:21	condoms	91:1,8,18
chronology	84:22	82:14	117:11
41:15	85:5,6,8,	93:16,25	Conyers
church	9,20,22	96:1	15:3,6,9
125:13	86:4	113:24	22:5
cigarettes	113:8,10	confidential	cool 91:3
145:16,17	coat 113:9	9:22 12:16	93:11
Clarke 67:9	coke 75:12	confirm	coordinated
119:13	100:22	18:10	10:11
121:4	cold 113:7	58:5,25	cop 110:7
147:6			

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: cord..defendant**

cord 133:12	County 14:24	cross 45:10	140:10
Corey 70:5,7	15:1	crying 49:4	day 18:21,
148:13	couple	123:24	22 24:4
correct	20:21,23	CSEC 42:3,	28:24 29:4
11:12 12:5	37:14	9,25	36:20
18:8,9	76:7,25	123:15	46:25
24:20,24,	83:5,7	125:4,8	50:11,12,
25 25:12	97:23	custody	13,14,24
26:1,3	99:17	129:4,9,10	51:2
29:11,25	103:22		54:22,23
30:6 35:7,	104:9,10,	D	55:8,23,25
23 37:12,	16,17		56:1 67:18
16 38:19	105:1	d/b/a 9:3	72:8 79:7,
39:23	court 8:16,	dad 16:7	19,22 85:2
40:11,14	20 10:4	Dana 8:25	86:9,10
41:23	121:23	9:13	88:2,4
44:10,18	cousin 16:6	Darcelle	90:6,12,16
45:22	72:13 73:3	124:6	96:9,21
48:11	144:18	data 141:25	101:24,25
63:21	145:7	date 8:13	102:22
67:8,13	146:13	20:5,19	110:15
68:16	cousin's	24:3 98:10	113:16
69:22 70:8	73:7	130:6,9	137:3,4
73:8 81:21	cousins	132:15	days 24:5
90:11	15:24	134:15,18	36:12,13,
107:7	144:18	136:18,20	14,17
119:14	146:6	138:12	37:15,19
124:14	covered	141:20,22,	38:2 54:20
135:4	101:20	23 142:1,2	63:23 65:1
138:13	Covington	dates 65:16	123:1
correctly	15:7	122:24	dead 16:5
52:23 72:6	crack 75:10	daughter	Deanshanaye
104:13	101:1	16:15	147:14
cough 42:20	crop 85:25	David 8:22	Decatur
Counsel 8:19			14:24
count 33:22			defendant

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: defendant's..employees**

9:2	desk 59:2	displayed 23 93:14,
defendant's	60:5 87:2,	140:15 22,23
129:21	19 93:24	94:19,20
132:2	94:18	99:7,15,
134:4	95:11,17,	17,21,24
136:3	20,23	documents 100:1,5,20
137:22	96:5,19,21	24:2 103:1
143:16	97:13,18	121:23 106:15,17,
Dekalb 14:24	98:1,16	Dontavis 23 107:12,
15:1	99:11,13	149:11 14 118:5
depend 78:7	100:14	130:20,22
80:10	101:16	door 78:24,
depended	104:21	25 79:1 131:4,5,
78:15	111:19,22	88:14 15,16,17,
80:12,19	112:22	89:16 22
depending	detail 50:7	doors 65:11 duly 9:6
77:13	details 12:21	113:22 duty 96:7
depends 98:9	determined	Drive 9:16
deposition	24:21	19:7 24:9
8:1,9	DFCS' 126:14	34:15 35:5
9:12,21	dictating	57:10,17
10:16,24	10:6	62:18,20,
13:9 76:2	difference	22 83:5
143:15	100:19	130:25
describe	difficult	131:11
83:10 85:7	48:3	147:2
87:23	directly	drop 42:20
describing	41:24	126:12
89:12 94:5	dirty 89:19	dropped 29:8
description	disappeared	122:9
149:14	67:18	dropping
designated	discussion	121:23
9:22	108:24	127:3
143:15		drove 19:9
		drugs 73:11,
		14 74:21,

E**earlier**

69:20

81:10

107:25

early 52:3

65:18

115:1

119:12

120:1

144:1,3

elevators

60:8

embarrassing

44:25

employees

116:2

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: encounters..finished**

encounters	everyday	147:19	feel 48:1,2
86:24	96:22	expecting	78:14
87:1,2	everything's	78:2	79:12
end 12:17	129:16	experience	93:13
25:1,14	evidence	125:18	94:1,2
35:24 39:4	68:20	experienced	97:18
40:24 43:1	exact 20:5,	125:5	114:5,9
61:8,15	22 24:1,3	extra 31:13	116:5,6
64:2 65:21	56:3	53:12	117:21
75:18	100:19	102:10	136:21
102:14	144:5		137:2
103:6	exam 124:16	<hr/>	feeling
123:12	EXAMINATION	F	116:1
149:20	9:8	fact 111:24	felt 80:13,
End- 148:13	exchange	130:12	15,18
Endco 70:5,7	100:8	fair 101:5	fifty-fifty
148:13	107:2	112:5	79:4,14
ended 24:14	exchanging	119:19	80:5
26:9 28:25	107:11	fall 115:15	fight 60:2
29:8 42:4	excuse 24:22	familiar	figure 47:2
43:25 46:4	64:14,19	51:22	filed 10:14
47:11	119:25	129:25	120:12,25
60:9,10	Exhibit	132:7	128:25
63:7	129:20,21	140:21	129:2
121:23,25	132:1,2	family 66:11	finally
122:12	134:3,4	129:14	13:25
126:11	136:2,3,7	146:9	Finch 8:23
127:3	137:21,22	family-owned	find 82:5,
English	138:1	116:8	22 83:4
116:22,23	143:15,16	father	123:14
117:4,6	expand	17:11,12	finish 12:12
entered	127:21	February	finished
93:21	expect 94:11	8:2,13	142:15
errand 30:14	130:8	16:25	
et al 8:11			

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: firm..good**

firm 9:1	80:14,17	101:21	44:2,12,16
fit 39:8	82:18	generally	48:19
five-week	87:2,12,19	12:22	52:18
31:5 33:18	94:17,18	77:21	53:18
flagging	95:11,16,	81:12,25	57:25
94:24	17,20,22	86:23,24	58:7,10,
floor 46:10,	96:5,10,	Genesis	12,15,17
11 49:6	19,21	149:3	66:2,3
51:6 65:6	97:13,17,	gentlemen	114:3
focusing	18 98:1,16	70:10	118:7,10
41:17	99:11,13	76:12	125:4,7,
folks 112:21	100:14	Georgia	11,16,25
follow 13:11	101:16	14:13,24	give 11:5
follow-up	103:13,14	15:3,7	13:16,22
76:7 77:12	104:21	16:12	55:6 72:15
108:22	107:16	girl 25:5	75:13
food 30:15	110:1,12	27:9 29:7	78:22
82:12	111:19,22	35:13,15	94:16
95:24	112:22	45:5 52:21	95:14
Forest 70:5,	full 138:17	60:11	100:4,5
7 148:13	funny 91:12	62:24 63:1	102:11
forget	G	67:17 69:5	107:5,25
143:13	Gambrell 9:1	76:21	127:1
frame 44:4	gas 30:16	118:11,14,	136:1,5
62:6 64:10	83:7	15 121:12	137:20
66:13	133:3,5,7	129:15	139:25
frames 43:14	gave 46:1,2	146:20	giving
friends	51:1 72:13	girl's 85:20	107:12,13
66:11	73:6 99:24	girlfriend	128:4,15
front 49:5,7	107:16,19,	35:14	glad 13:8
52:12,24	22 144:7	60:11,13	Global 8:17
59:2 60:5	GED 124:16	girls 36:8	goal 129:6
65:7	general	38:9,16,20	good 8:7,22
	77:13	42:11	9:10,11
		43:6,9	70:19
			108:20,21

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: grandmother..hear**

125:18,21	12 41:25	gum 82:14	34:3
129:16	43:23 44:2	gummy 74:12	37:21,25
grandmother	98:3,7	guns 76:13,	45:23,24
16:8	116:7	15 93:15	46:6,7,19,
great 15:21	122:14,21	94:2	23 48:17
30:11	144:24	guy 43:22	49:23,25
grew 15:3	145:1	113:19	50:24,25
Griffin	grow 14:25	guys 134:22	51:15
149:1	15:1		59:18
grilling	guard		60:3,15,22
48:2	109:19,22,	H	65:20
Grimes 8:9,	24 110:20,	hair 127:4,	71:24
10,24 9:10	25 111:1,	7,15	88:15
10:12	15	half 101:10	94:12
14:10 15:5	guardianship	128:17	104:12
16:19 18:2	129:2,3	hall 102:14	119:21
19:22	guards	103:6	122:21
30:22	109:17	hallway	123:18
32:11	guess 11:2	60:4,9	129:13
41:11	32:23	65:6	happening
55:22 66:7	35:14	hand 13:13	135:14
72:16,25	50:8,20	90:18	146:3
73:4 76:3,	83:2 87:6,	99:23	happy 14:20
6 81:11	15 98:9,14	hands 107:3,	17:3
108:20	106:8,10	11	hard 42:16
111:18	110:6	happen 22:3	48:1 75:11
119:12	117:20	77:18,21	100:21
139:23	122:3,24	80:16	126:22
143:5	136:13	88:21	head 13:18
144:11,12,	137:17	145:20	137:14
17 146:5,8	138:5	happened	heads 129:12
ground 13:10	guessing	22:8	heal 125:17
group 38:14,	145:7	23:14,18	hear 21:12,
21,22,25	146:3	25:13 29:1	13,14 42:7
39:1,3,4,	guest 138:8		44:14
			90:10 95:6

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: heard..housekeeping**

103:10	hiding	133:25	102:9
105:6	112:13,17	hope 33:13	104:15
115:7	high 95:14	123:12,15,	107:4,6
117:13	136:12	20,25	113:20
118:22	Hispanic	124:10,24	116:2,8
128:1	93:2	125:1,3,19	130:24,25
heard 23:19	116:14	126:1	131:2
26:17	hit 77:10	128:2	144:25
51:23,24	hold 44:22	148:3,5	145:6
52:23	119:16	hotel 10:22	hour 101:10
77:25	121:20	11:2,11,14	house 42:11
105:11	holding	18:19,20	123:11,12,
117:19	123:13	19:1,5	15,20,25
hearing	home 38:22,	24:7,17,18	124:9,24
21:17	25 39:1,4,	28:24,25	125:1,3,
42:16 48:8	12 42:1,4,	29:9,10,	10,18
104:13	8,9,25	12,15,17	126:1
heart 28:15	43:1,2,23	34:7,20,22	127:18
Heartless	44:2	35:4,12	128:2
134:21	122:14,21	37:22	148:3,5
helped 124:1	123:15	46:8,12	housekeeper
125:11	125:4,8	47:1,5,8,	82:17 88:4
helping	128:3	10,12	90:23
41:14	144:24	48:9,10,	93:4,13
57:23 58:3	145:1,2,4	15,22	housekeepers
63:10	homes 38:14,	49:6,9,12	87:11
76:10	21 39:3	51:5 57:9,	116:15
117:16,22	honest 75:4	14 59:5	housekeeping
Henry 123:9	133:15	60:5 61:22	87:2,6,15,
Hey 137:14	honestly	62:12,17	18,22,25
hide 93:14,	38:3 78:18	63:7 72:7	88:2,13
15 94:8,12	84:10	79:10 81:7	89:20
111:24	86:13	82:10,11	90:6,12
112:4,11	92:18	86:25 87:7	91:2,23
	106:19	88:3,11	92:12
		98:19	93:14,19,
		101:7,22	

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: Hu-huh..Inn**

23 94:6 ,	121:7	144:19	45:6,16 ,
16,17	ILP 126:14,	147:19	21,25 52:8
95:2,5,8	16 128:10	Ingram 123:9	61:3,12
96:7	image 132:7	initially	63:7,20
101:14,15	136:9	39:5,6	64:3,14,19
113:21	imagine	Inn 9:3,16	65:4,21
Hu-huh	41:16	11:15	66:7 67:6 ,
90:16,20	incident	12:3,9	15 68:1
92:13	39:16	13:5 18:4 ,	70:21
110:19	109:14	6,8,12,14 ,	71:7,9,11 ,
husband	incidents	17 19:13 ,	18 78:19
116:19	39:14	24 20:4 ,	79:3,6
Huseby 8:17	Incorporated	11,12,16	81:18
hygiene	8:11	21:25	85:11,14
82:12	independent	23:2,22	86:8,18
95:24	126:16	24:9,15 ,	88:1 93:4
I	Indian 92:17	19,23	95:21
Ibrahim	indicating	25:3,14 ,	98:17
17:15	22:2 33:23	15,20,25	101:13
ice 75:2,3 ,	51:16	26:3,7,8 ,	106:20
6 100:20 ,	57:15,18	12,18	108:25
25	60:14,21	27:1,19 ,	109:4,17
ID 69:18	63:9,24	21,23 28:3	115:14
idea 9:25	65:2,15	29:23	117:15
32:12 56:8	75:11 78:3	30:23	118:1,23
identification	84:1,5,17	32:11	119:14,25
129:22	124:17	33:19,21	120:1,12
132:3	137:7	35:18,25	121:1
134:5	139:16	36:9 37:2 ,	122:11,18
136:4	140:8	14 38:1,8 ,	123:1,4,5 ,
137:23	Industries	17 39:21	6,8 124:23
143:17	8:11 9:3 ,	40:1,5,10	131:12
identified	15 10:15	41:17,20 ,	132:13
information	44:17	22 42:5	133:18
		43:2,3,7 ,	135:11
		24,25	137:19
			138:2,8
			141:1,12

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: inside..King**

147:22,25	item	140:15	23:24	kicked	60:3
inside 82:10	items	96:13	jumpsuits	Kikia	149:9
Instagram			85:25	killling	
22:23	J			115:4	
146:21	J.G.	8:1	K	Kimahdi	
inter-	9:5	12:7	K-E-E-V-I	43:19,20	
101:21	jacket	113:9	25:8	Kimani	36:2,
interact	January		K-E-V-I-I	8 43:4,8,	
68:9 90:6	14:17		25:8	20,21	
101:23	35:21,22		K-I-N-G	44:16	
interacted	37:14,22		28:10,11	45:10	
90:12	38:1,10,17		Keiron	64:4,6,8,	
92:12	40:1,13,14		148:10,23	13 148:8	
101:25	44:23			kind	10:6
116:18	63:20		Keisha	13:9 35:13	
interactions	64:25		144:17,20	42:8 51:2,	
86:17	65:19 66:9		146:14	6 62:9,14	
87:17,18,	115:17,20		Kennedy	73:14	
25 101:12,	122:12		14:12	74:12,23	
22 112:21	123:1		Kerns	77:12,16,	
interview	JG00172		42:14	21 82:20	
123:17	140:4		Kevy	88:13	
introduce	Jhordyn	8:9,	25:5,7	90:18	
8:19	10,24		27:18	93:10 94:2	
introduced	12:19 66:7		28:22,24	95:14 96:8	
9:14	76:3		29:16	101:2	
118:13	144:11		45:5,9,14,	106:11	
invoice	job	126:23	18 46:2,21	110:5	
71:19	127:9		66:20,23,	111:10	
involves	Joc	120:4,5	24 67:12,	113:18	
83:18	121:24		16 148:6	138:18	
involving	122:17,20		key	144:2	
18:11	123:9,10		71:19	146:9,10	
124:23	July	21:3	97:20,22	kinds	85:21
			102:11	King	28:4,
			107:23,25	8,21 29:8,	
			keys		
			97:23		

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: King's..listed**

9,10	34:16	Lamar	149:11	113:17
31:11,13,	38:20 60:2	language		leaving
14,15 32:1	81:4	116:25		24:14
36:18,19,	145:25	lash	127:16	28:25 46:4
21 37:4,	146:1,8,			65:21
11,15	12,16	Lashanda		
47:3,11	knock 78:24	15:17		left 24:15
48:9,10,15	79:1 89:16	lashes		29:1,2
52:4,8		127:13		33:21
54:1,18	knocked			34:6,11
55:4,9,23	88:21,24	late 115:1		38:5,7
57:22	knocks 88:14	144:1,2		40:1
58:8,25	knowledge	law 9:1		46:23,24
59:16,20	125:1	34:9		49:12,15
61:15,18,		lawsuit		65:23
25 62:10		10:13		109:9
64:1 65:13	L	11:11,16,		113:18
73:11	L-A-S-H-A-N-D-	22,23		123:4,5,7
74:18,22	A 15:20	12:2,6,17		135:18
76:11 77:6	L-O-N-D-Y-N	18:2,11,12		leggings
78:8 80:1,	16:20	120:11,16,		86:3
23 82:4,24		23,25		letting
83:6 84:10	labeled			117:17
93:10	122:1	lawsuits		
94:7,14	147:15	13:3		level 65:7
95:7,22	labelled	lawyer 9:13		95:14
96:5 97:7	121:25	10:2 136:5		light 111:5
102:7	ladies 82:17	139:24		lighters
117:25	lady 94:18	144:7		145:17
118:2,4,6	100:11	lawyers		list 67:1
136:12,16	101:25	124:21		144:7
143:20,23,	102:18,20	126:2		Listcrawler
24 145:13	107:1,10	lead 117:14		51:21,23
148:8	114:15,17,	leave 30:8,		57:5,7
King's 49:1	25 115:10,	10,13 34:4		62:11,17
133:6	22 116:13	37:22,25		listed
knew 29:20	117:7,10	38:2 71:18		

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: listening..marks**

144:22	Londyn		94:4
listening	16:19,22	M	121:6,8
29:17	17:9,20,24	M-A-H-D-I	makes 19:18
literally	128:24	17:17	27:13
17:1 48:10	Londyn's	machine	53:14 54:7
65:10	17:11	97:16,17	106:14
99:23	long 23:22	made 73:17	110:10
Litigation	30:1 36:10	79:19	127:17
8:18	54:17,23	82:21	137:3
live 14:11	61:5 124:9	111:19	making 10:5
15:9,14,22	looked 79:6	118:4	26:15
16:4 17:25	93:20	121:18,19	32:18
30:9	100:22	126:20	mama 48:20
lived 15:8	109:11	138:5,10	50:17
lives 15:6	113:11	Madison	53:19 83:6
living 15:23	114:24	148:2	119:3,4,7
22:4 39:22	143:14	Mahdi 17:15,	mama's 48:21
52:13,16	loop 138:19	17,18	man 22:6,9
119:6	lost 64:16	maid 93:13	64:6 84:11
126:17	lot 39:10	main 65:6	113:17,19
128:14	45:13	maintenance	man's 22:11
lobby 49:7,8	56:17,24	87:15	managers
65:8,12	57:10	majority	116:1
80:15	80:14	62:15 82:5	March 119:23
104:17	109:21	make 14:3	marijuana
105:19	110:2	27:5,14	132:14
located 19:6	114:7	29:21	marked 110:3
locked 27:7,	124:1,2,8	32:24	129:21
13 34:17,	127:7,21	33:4,14	132:2
18 61:9	129:13	51:12	134:4
72:8	134:1	52:19	136:3
109:15	love 125:23	57:5,8,9	137:22
122:17	lunch 111:17	62:23 68:1	143:16
131:1		82:4 90:11	marks 145:5,

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: mask..money**

9,10	35:5 57:9,	28:21,23	109:7
mask 133:3,	17 62:18,	29:9,10	113:19
5,7	19,22 83:4	32:2	131:15,18
	130:25	43:22,23	135:12,22
matter 8:9	131:11	47:3,12	minute 119:5
maximum	147:2	48:10,15	minutes 99:4
125:9	memories	50:14 52:4	143:6
Mccranie	135:1	58:14,17,	
8:23	men 26:7	19 60:12	misunderstood
	27:3 28:2	64:13,18	120:21
meaning	55:16	118:14,16,	mix 92:20,
46:11	57:4,8,23	24 119:10	22 93:1
136:16	62:10	124:24	106:11
means 33:1	63:13	Michael 8:15	116:12
136:22,24	68:23 69:1	microphone	mixed 125:21
139:9	76:10,24	10:7 11:9	mom 15:15,
meant 87:10	84:15,22	21:20	23
115:8	92:14	40:21	mom's 15:16
Media 8:8	114:4	middle 61:8	money 26:15
40:24 41:7	134:24	142:7	27:6 29:21
75:19 76:2	148:19	middle/end	32:18,21,
108:17	mental	34:1	24 33:5,7
143:2	125:22	mind 21:18	46:2,3
149:21	mentioned	42:15	51:13
medicine	9:14 57:2	44:13	52:19
96:2	73:9 81:10	72:20	59:13,14,
meet 22:9,	99:4	139:21	16,22,23
22 78:16	message	Mini 63:3,4	60:1
124:20	146:20,21	66:20,23	94:16,19
meeting 29:8	messages	67:12,16,	100:5
47:11	66:12	22,23	107:2,5,
60:10	134:12	84:11,12	11,13,17,
64:15,23	met 9:12	97:10,12,	20,24
Memorial	22:6,24	19,20	108:2
9:16 19:7	25:6,11	104:21	118:5
24:9 34:15	26:9	105:19	121:9

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: monitor..occurrence**

127:1	move 62:7	100:23	Northbrook
128:5,15	76:8	nap 55:10	8:10 9:2,
131:14,18	119:12	nature 125:6	15 10:15
monitor 8:14	125:16	Naynay 66:4,	notes 142:14
month 20:20,	139:21	20,23	notice
25 21:6,7	moved 15:2,	67:12,18,	110:15
months	12 31:9	21,22	112:9
20:21,23	39:12	147:15,17	November
124:11,13	52:10	necessarily	33:22
128:14	69:13	89:13	34:1,2
morning 8:7,	123:22	neck 145:21	37:2 40:12
22 9:10,11	moving	needed 47:18	61:8,17
81:11	127:23	82:15 92:7	66:8 109:1
108:23	multiple	97:5,7	130:6
mother 148:3	61:24	98:24 99:2	134:16
Mountain	98:11	needing	number 56:3
11:15	106:13	91:19	78:10,18,
12:3,9	118:7	114:1	21,23
13:5	music 139:2,	nice 91:5	79:17
18:12,14,	3	nickname	
17 20:12,		22:17 74:4	oath 13:14
16 21:25	N	night 30:19	Obie 149:5,
23:2,7,22	named 25:5	34:24	7
25:20,25	36:2 45:5	35:3,9	obvious 93:5
39:21	64:4,6	51:1 52:25	occasion
41:21	73:3	61:1 79:7	95:15
43:24	118:14	85:3	occasions
64:14,19	names 28:1,	102:16,17,	81:22
119:14	13,14	23 110:15	occur 53:8
120:1,12	31:23	nighttime	61:23
121:1	38:12	60:10	occurrence
122:11,18	43:10	110:16,17	108:25
123:4,6,8	44:11	noodles	
124:23	63:14	82:14	
mouth 33:12	92:11		

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: occurring..period**

occurring	117:10	paperwork-wise	128:16
53:11	126:15	72:1	pays 127:10
October	143:23,24	park 56:18	pending 14:4
20:7,23	one's 28:18	78:13,14	people
21:4 24:24	ongoing	80:12	56:12,19
26:2 29:24	11:16	109:20	57:14,22
30:5 37:2	opposed	parked	58:3 61:4
40:12	101:2	110:12	66:23 67:4
41:20	137:5	parking	71:5 79:10
43:15 44:7	order 9:23	56:17,23	83:14,15
45:3,14,24	original	80:14	84:19
52:3 61:17	141:24	109:21	86:17,24
66:8	ourself	110:2	87:6,9,12
132:25	84:10	part 37:9,	90:23,25
136:18	outfit	10 90:21	91:2,5
138:13	85:11,14	110:22	92:22
141:20	owner 124:6	112:16	94:16,17
142:6	<hr/> P <hr/>	120:14	98:1,7
October/		participation	101:12,22,
november		143:7	24 103:16
36:21		parties	107:6
115:15	p.m.	140:15	112:23,24
off-the-	108:10,18	passed	116:7,9
shoulder	136:22	124:16	127:22
85:24	137:6	patrolling	146:19
office 82:23	142:19	109:22	147:2,22
95:16	143:3	110:25	148:18
98:10,11,	149:20	period 25:19	31:5 33:18
13 103:13,	paid	pay 31:18	37:17
14 107:16	107:22,24	59:2 94:19	38:17 52:7
old-school	paper 34:10,	95:4 99:8	54:18
10:7	11 71:21	102:10	61:2,16
older 16:5	papers 72:7	107:18	64:21
100:11,12	paperwork	paying 32:4	65:14
114:24	71:17	107:8	70:13
115:1,2			124:15

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: periods..present**

periods	133:21	123:14	103:4
40:10			104:20
Perry 70:2	photograph	places 77:14	106:7
148:10,23	132:16	plaintiff	127:14,20
person 97:25	photos 70:20	8:24	145:4
110:18	71:1	11:22,24	
114:2	129:18	13:3	pointed
131:4	physically	plan 127:22	145:7,22
person's	118:15	play 51:3	police 24:2
120:5	pick 126:25	55:18	28:14,18
personal	picked 43:5,	56:11,17,	63:15
82:12	8 44:1	23 77:17,	68:20
95:24	45:18	19 78:2,4,	69:21 72:3
personally	picking	11,18,22,	109:4,5
32:6 68:9	21:19	24 79:2,5,	110:3
94:2 116:6	picture	18 80:9,	post 51:12
PH 43:19	129:25	12,19,21,	78:9,20
66:4	132:9	25 81:6	80:24
phlebotomy	134:11	plays 55:11,	posted 51:18
126:10,19	136:13	12,23	130:11
128:9	138:23	56:1,10	136:13,25
phone 55:10	139:14,15	57:4,8	137:4
68:1,7,17	pill 73:24	59:14	potential
97:22	74:14,15	62:16	144:7
104:15	101:3	68:2,9,14	powder 75:12
105:6,7,8	pills 51:1	79:8,19,20	100:21
127:1	55:6 73:17	82:5,6,22	premises
133:16	74:9 75:13	83:4,11	110:21
134:13	place 20:14	pleasant	preoccupied
141:2	21:25	91:18	56:16
phones 68:2,	34:21,25	plug 131:2,	prepare
18	80:10	3,8	113:10
photo 130:3,	99:18	plug's	present
16 132:11	146:22	131:8,9	27:12
	placement	point 24:8	109:3
		50:8 82:23	

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: presently..real**

122:21	81:12,23	put 9:20	149:7
presently	82:2,5	33:12 66:5	Quinton 70:4
14:10	83:3,10	97:21	148:23
pretty 14:9	protect 50:5	105:7	quote 117:10
21:15	protective	118:12	
43:16	9:23	121:21	<hr/> R <hr/>
69:17,18	provide	141:22,23,	
87:8 91:3	70:23	24,25	race
115:6	provided	142:9	116:13,16
previous	85:9,19	145:1	racess 116:12
137:3	139:24	putting	rags 89:24
145:6	provocative	139:5	114:1
previously	83:22	<hr/> Q <hr/>	raised 13:13
25:24	84:21	question	rape 125:6
41:21	psychiatrists	12:12	Raven 69:4
118:1	125:14	13:19	re-branded
145:6	pull 40:21	14:3,4,5	127:15
prior 43:22	139:25	23:3 25:22	re-rent 54:7
128:14	purchase	30:11	re-up 93:25
privacy	46:3 59:7	33:11	130:23
127:23	82:13	37:24	
professional	95:23 96:1	55:14	reached
48:5	purchased	66:16	12:18
program	46:3	77:12 88:7	read 144:8
126:13,20	purchasing	115:24	149:25
Promise	82:25	120:22	ready 78:11
58:22,23	96:13 97:4	143:19	93:25
118:14	104:3	questions	real 22:17
prompted	purpose	10:13	28:12,16,
120:11	25:16	13:12 48:2	18 72:24
property	30:13 82:1	71:15 76:7	73:1 91:22
30:8 65:3	133:21	81:14	112:8
71:24	138:22	108:22	126:22
80:10	141:4	140:5,19	137:8
		Quintavious	

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: realized..Richens**

146:9	142:20	73:10	represented
realized	143:3,14	92:18 93:1	124:22
64:9	149:18,21,	109:25	126:1
	24	110:23	representing
reask 23:3	records 24:2	133:25	41:18
reason 14:1	recover	134:2	126:2
112:23	125:11	135:18	request 62:3
reasons		141:7	requested
98:17	referenced	remembering	81:7
recall 24:1,	31:22	135:5	reserved
3 40:3	Regain 129:8	rent 32:2,	31:24
65:23	regular	4,7 54:5	residence
115:13,19	13:25 14:2	69:14	14:11
135:15	114:2	128:16,17	residents
receipt	regularly	rented 53:25	125:1
71:19	90:13	59:10,11	resources
received	103:23	renting 32:8	128:23
72:6	reiterate	69:12	respect
recently	12:20	repeat 13:20	107:10
128:12	related	36:23	response
recess 41:3	144:20	repeating	11:6 13:16
75:23	relating	10:8	rest 61:2
108:13	10:13	report	restaurant
142:23	relationship	28:15,18	138:5
recharged	17:19	43:17	restroom
97:21,23	22:7,25	63:15	40:17 90:2
recognize	23:6,9,13,	69:21	138:6,11
19:10	15	reporter	return 40:4
record 9:20	relationships	8:16,20	129:2,3
21:20	129:14	10:4 12:11	review
40:25	remember	21:7,10	149:25
41:9,12	19:2 24:11	reports 72:3	Richens 8:25
75:20 76:4	34:14	represent	9:9,13,19,
108:8,10,	38:3,13	9:14	
18 129:19	40:2 65:24		

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: ride..screenshot**

24 12:14,	25 47:18	17,18	138:9
20 13:1	48:18,24,	104:16,17	141:16
21:11,13,	25 49:1,2,	105:3,7,18	Rose 66:4,
23 40:18,	5,24 50:1	106:9,12	11,20,23,
20 41:10	51:4 52:9,	107:9,23,	25 67:10,
42:23 44:6	10,12,14,	25 108:2	12,16,20
75:16 76:5	17,20,22	109:7	
108:7,19	53:2,4,12	113:21,22	rotate 98:5,
129:23	54:5,6,8	114:3	15
132:4	56:12	118:11,13,	rules 13:10
134:7,9	58:10,15	21 131:8,9	run 30:13
136:5,6	59:3,7	133:17	43:1
137:24	60:4,16,	135:12,17,	
139:20,22	19,25	20,22	Russell 9:1
140:10,14,	62:3,4	138:7,8,11	
17 142:13	69:5,13	141:12,14	<hr/> s <hr/>
143:4,18	70:12	148:19	
ride 36:1	71:18,19	rooms 31:4,	S-H-A-Q
47:1,5	76:24	6,7,13,15,	22:15
rock 75:11	77:18,20	20,24	S-P-E-N-C-E-R
100:21	78:2,4,6,	32:3,5,7	15:20
101:2	10,12,18,	52:11,18,	safer 80:18
rocks 100:24	20,23,25	24 53:25	safety 50:4
roll 102:22	79:5,9	54:4 56:15	salon 127:11
Ronnie 120:4	81:8 88:4,	59:1,11	save 127:2
121:24	5,6 89:19,	61:24,25	132:17
room 10:1	20,22	62:1,2,4,5	scared 93:12
29:2,3,6	90:4,14	69:12,15	scattered
31:1,10,	91:10,17,	78:13 95:8	93:24
12,13,18,	19 93:4,5,	96:15 99:8	school
19,20	20,21	102:1,15	113:12,13,
32:2,4	96:16	103:5,7,8	15 126:8
34:9 36:9	97:24	104:4,23	screenshot
37:18	99:16	105:24,25	132:19
46:3,4,8,	100:1	106:6,7,	134:12
10,11,20,	102:2,7,	10,13,20	
	11,13,25	107:21	
	103:4,6,	135:16	

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: scurry..sleep**

146:20	set 31:11	shape 74:10	siblings
scurry 94:7	102:7	Shaq 22:12,	15:25 16:1
season	sets 86:1	13,15,22,	sic 25:8
113:10	settle 12:23	24 23:6,9	side 19:19
security	settled	25:6,11,	49:5,7,11,
109:16,18,	12:22,24	17,24	12,15
21,24	settlement	26:3,6,9,	52:12
110:4,7,9,	12:18	11,14,19,	146:9
20,24	sex 18:7,	24,25	sign 149:25
111:1,15	13,18	27:6,7	signed 34:10
sell 118:5	29:12	29:16,20,	71:22
127:7	32:13,21	21 32:18,	128:12,13,
131:5	33:7	22,24 33:5	20
selling	39:15,17	45:21	similar
74:21,24	42:12	46:1,2	100:23
75:2	55:17	51:25	single 76:14
106:15,23	56:10 93:5	sheets 83:1	121:24
131:16,17	106:17	90:1,3,13,	sir 21:9
sells	111:25	18 91:17	sister 16:3,
130:20,22	112:8,25	93:17	6 48:21
send 77:19	120:17,24	96:11,14	50:18
141:7,8	121:8	113:25	119:8
sense 19:18	125:5	114:1	sisters 16:2
27:13,14	144:20	shift	sit 48:24
53:14 54:7	sexual 53:7	102:16,17,	90:1 110:1
94:3	106:22	23	sitting
106:14	125:5	short 41:3	21:15
110:10	sexually	75:23	six-week
113:4	42:12	108:13	126:13,20
127:17	shaking	142:23	skinny
137:3	13:18	show 129:18	100:11
September	Shameka	139:23	114:25
21:3 22:10	72:16,18,	140:4	sleep 52:25
serve 34:9	22 73:3	showing	
	146:5	69:18	
		141:9,10	

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: sleeping..strolling**

sleeping	speak 21:11	142:18	17 20:12,
53:4	111:15	149:19	16 21:25
slept 52:13	116:23	standing	23:2,7,22
slide 117:18	117:3	47:16	25:20,25
slipped	speaker	start 50:11	39:21
44:13	105:8,11	55:11	41:21
slowly 14:8	speaking	87:21	43:23
Smith 9:1	21:18	started 9:12	64:14,19
smoke 75:7	42:15	48:22 50:2	119:14
smoked 75:8	103:23	64:8	120:1,12
smoking	116:22	126:19	121:1
132:13,14	spell 15:18	Starting	122:11,18
soap 82:14	25:7	30:5	123:4,5,8
soft 100:21	72:19,20	station	124:23
sold 75:12,	spelling	30:16 83:7	stop 49:22
13 93:22	72:19	stay 16:7	54:10
95:24 96:2	Spencer	34:23 55:7	84:22
102:2	15:17,20	60:18 63:6	133:24
103:1	spend 30:19	64:25	stopped
Sonya 148:2	spent 60:25	73:12,17	97:22
sort 9:25	spoke	staying 22:5	store 82:10
54:21 59:1	103:21,22	54:1 58:15	story 123:16
117:15	116:25	119:5	straight
sound 47:15,	147:7	129:5	122:24
24 139:2,	spray 89:23	138:10	straightforward
10	staff 87:3,	141:15	14:9
sounds 50:23	4,5 92:12	stays 16:6,8	street
52:3 61:20	101:19	18:1	19:18,20
Southeast	148:5	step-by-step	30:17
14:12	stairs 60:6	53:24	strip 19:14,
span 37:7	stamp 132:18	Stone 11:15	17
	stand 40:22	12:3,9	strolling
	57:11	13:5	83:2,9
		18:11,13,	84:3,7
			85:23 86:7

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: stuff..talking**

stuff 30:17	suggested	103:5,7	34:21 35:5
47:18	103:5,7	104:23	41:15
48:24	104:23	106:10	43:18
51:8,13	105:24	switched	45:7,9
52:13	suggesting	103:8,18	57:13,14,
55:6,12	106:2	105:24,25	16 71:5
60:6,8	suite	135:16	76:9 95:13
62:18	127:14,17,	switching	101:15,16
76:23	23	31:20	108:23
78:11	Suites 9:4,	82:25	114:15
82:11,15,	16 11:15	106:6,7	115:21
24 83:4,8	12:4,9	113:24,25	117:8
86:3 89:5,	13:5	sworn 9:6	118:18
8,24 90:2	18:12,14	13:14	122:25
91:14,16,	35:18		144:12
17 93:16,	39:21	T	147:6
22,25	101:13		148:6,8,9,
96:2,3,6,	sun 55:5	tag 139:5,	15
10,14	113:15	11	talking
103:9,17,	Sunday	takes 127:6	23:23
22 107:19	125:13	taking 99:18	24:9,10
113:3	supplies	126:8	33:14 35:1
114:20	89:5,8	133:21	38:7,25
116:20	supposed	141:5	39:15,25
118:21	81:5	talk 62:19	43:15
125:7,15,	102:10	63:18 67:2	44:5,7,22
17 127:2	107:17	91:4,7,21	45:10
128:17,23	108:1	92:9 95:7,	50:20 52:2
130:20	113:12,13	10 103:19	54:19
131:8	suspecting	105:5	57:20 63:2
145:2,10	146:17	110:18	64:8 66:1
146:23	swear 8:20	118:4,22	77:2
sued 11:2,	sweet 125:23	123:25	81:11,18
11 12:3	switch 82:16	125:23	84:6 85:6
13:4 18:6		talked 13:15	94:15
suggest		33:17	95:17
103:4			101:11
			102:19

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: tampons..time**

107:2,11	text 68:14	49:20	62:6 63:19
111:18	texting	115:8	64:10,15,
115:11	66:12	thoughtful	18,21,23
122:6	68:13	143:10	65:14
124:5	therapists	threaten	66:13,14
130:25	125:14	76:18,22	70:13
134:1	therapy-based	threatened	75:19 76:3
142:4	125:12	77:4	77:17,24,
tampons 96:2	thing 10:21	76:21,25	25 79:25
tank 85:25	55:5 71:25	throat 42:19	82:5 96:7
teasing	73:25	tight 146:9	98:10
115:7	79:4,14	time 8:14	102:9
telephone	96:13,22	20:3 22:4	105:2,17,
68:2,4	100:18	23:23 24:1	23 107:15
telling	103:14	25:19 26:7	108:9,17
50:17 67:4	104:22	27:5,6	110:14
103:24	105:22	29:5,6	112:6,9
104:2,13	120:3	31:1 32:13	113:13,14,
107:21	122:20	35:17	16,17
114:11,13	125:22	36:11	115:5,14
146:21	133:13	37:1,6,7,	118:19
temporary	144:6	9,10,17	122:14,22
129:1	things 82:25	38:10,11,	124:2
Ten 79:16	94:8 95:23	17 39:9,	126:15,23
term 33:4	97:4	10,23	127:7,14
83:9,13,15	108:22	40:9,23	128:10
121:7	119:12	41:7,17	130:13
termination	thinking	42:16	131:9,12
129:3	23:11	43:6,13,	132:18
terms 62:10	112:7	14,24 44:4	136:22,23,
87:9 122:8	thought	45:16	24 137:12
testified	22:6,25	46:18,25	141:18
9:6	23:8,12,	48:4 50:5,	142:19
	14,19	19 52:2,7,	143:2,20
	26:16,17	20 58:7,13	144:23
	45:20	61:2,16	147:7,21
			149:20

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: times..transcribe**

times 33:5	103:25	97:1 114:1	34:25
76:25	104:5,18,	town 9:13	39:21
77:14,22	20,22	trade 96:6,	42:12
79:2,16,18	105:22	10 97:1	44:21 50:9
83:5,8	112:21	trading	52:8
86:5,7,22	117:11,12	96:13	54:18,23
88:23	118:9	traffic	58:8,11
90:24	123:16	57:10,16	61:19
96:20,25	130:19,22	102:25	65:13
97:23	toll 129:14	103:3,12,	67:7,14,25
99:17	Tomko 8:17	15,25	111:25
103:22	10:3 11:8	104:14,19,	112:8,25
104:9,10,	13:16	23 105:14,	118:1,7
16,18,24	toothbrush	15,23	120:3,7
105:1	96:1	106:3,9,	147:24
timestamp	toothpaste	13,14,15,	trafficker
132:20,25	82:15 96:1	17,19	26:12 27:1
142:1	top 46:10,	114:6,12,	traffickers
tired 73:18	11 108:2	14 117:12	26:25
tissue 48:12	topic 76:8	121:3	68:3,11
today 10:3,	tops 85:24,	traffic-	107:3
13 13:6,11	25	20:3	117:16
18:3 143:7	total 62:5	117:16	trafficking
149:18	touch 66:6,	trafficked	27:24
Today's 8:13	22,24 67:5	18:7,13,18	39:15,17
told 25:23	69:9	19:23	58:18
34:16,17	towel 71:9	20:3,10,	63:25 93:6
41:19	towels 82:16	11,15 22:1	106:18
47:17	83:1 89:11	23:2,6,22	119:13
51:6,9	90:1,13,	24:8,13,22	120:17,24
53:19 58:6	18,19	25:19,24	125:6
60:16,17,	91:10,12,	26:2,6,19	131:20
18 63:23	17 93:17	28:2 29:13	144:21
99:5	96:6,10	30:23	147:20
101:11		31:25	transcribe
102:3		32:13	13:17

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: transcript..United**

transcript	type 79:10	25 117:9	19:13,24
10:5	100:20	119:22	20:3,11
transitional	125:5	120:6	24:9,15,
128:3	127:22	122:16,19	18,23
transport	types 87:4,	123:2,21	25:3,14,
109:13	23,25	126:18	15,20
transportation	106:24	129:7	26:3,7,8,
126:21		130:1,7,15	12,18
	U	134:14,17,	27:1,19,
trash 94:1		20 135:13	21,23 28:2
113:24	uh-huh 11:4	140:2,22	29:23
trespass	13:18	141:3,16	30:23
72:7	22:14,16	144:14	32:11
trespassing	28:6,9	145:3	33:18,21
34:10	44:3 45:19	146:15	35:17,25
71:23	49:10	147:4,17	36:1,9
trouble	50:15	148:4,7,14	37:1,14
21:17	51:19	understand	38:1,8,17
truthfully	53:21	13:20,21	40:1,4,10
13:14	54:12	29:18	41:17,20
turn 14:18	58:20,24	32:11	42:5 43:2,
turned 8:5	60:7 62:8	33:11,13,	3,7,25
14:15	63:5 64:11	14 44:20	44:17
16:23	65:9 73:13	46:16	45:6,16,
17:1,2,10	81:16	53:15,17	20,25 52:8
41:2,5	86:2,20	71:13 94:4	61:3,11
75:22,25	87:11	111:7	63:7,19
108:12,15	88:8,12,25	119:11	64:2,13,19
142:22,25	89:17	understanding	65:4,21
149:23	92:23	32:16	66:7 67:6,
two-piece	95:19 98:4	57:1,3	14,25
86:1	99:7,12,22	72:6	70:21
Tylenol	101:17	uniform	71:7,8,11,
96:2,3	105:4	111:10	18 78:19
	110:11,13	United 9:3,	79:3,5
	111:20	16 18:4,6,	81:18
	114:17	8,17	85:10,14
	115:12,16,		86:8,18

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: unmarked..Wilson**

88:1 93:4	68:12	visited	143:19
95:21		145:4	144:6
98:17	vending		
101:13	97:16,17	visits	warn 103:2
106:20	verbal 11:5	111:18	watch 109:20
108:25	13:16	145:2	140:13
109:4,17	verbally		watching
115:14	117:19	W	104:18
117:15			105:13,14
118:1,23	versus 8:10	wait 120:21	
119:25	12:7 116:2	waived	ways 57:6,
123:1,5	victim 122:1	149:25	12,19
131:12	video 8:5	wake 55:12	weapons
132:13	41:1,4	walk 41:14	76:12
133:18	71:1	49:8 62:21	wearing
135:11	75:21,24	81:22	84:21 85:7
137:19	108:11,14	82:4,7,22	133:3
138:2,7,8	132:16,17,	83:22	
141:1,12	18,21,22	84:19	weed 75:13
147:22,24	138:2,6,	112:11	week 54:20,
unmarked	10,16,17		24 59:18,
110:4	139:9,24	walked 47:13	19 126:20
	140:3,4,	83:4,7	
unresponsive	12,21,23	walking	weeks 24:5,6
25:21	141:5,7,8,	56:20	30:2,3,7,
37:23 55:2	10,24,25	81:12	12,18,21,
unsafe 79:8	142:2,3,	82:2,3	25 32:13
146:22	21,24	83:3,10,20	33:22 61:7
upset 135:2	143:14	109:23	113:14
	149:22	110:21	When's 147:7
upsetting		112:12	whichever
134:25	view 140:16	113:5,8	94:22
		114:6	
upstairs	violent		white 92:17,
103:6	77:7,8		25
	145:15	wanted 29:16	
		80:12	wife 116:19
v	visit 29:23	132:21	Wilson 149:3
	144:24	135:8	
varied 56:6		141:6	

J.G. vs NORTHBROOK INDUSTRIES, INC., ET AL.**Confidential****J.G. on 02/08/2023****Index: wipe..Zaccheus**

wipe 89:24	107:4	
	117:15	Y
witnessed	118:12,17	
100:6		y'all 91:13
104:7,12,	workers	103:24
13,25	114:11	116:19
		133:23
witnesses	working	
144:7	23:10,11,	year 17:5
	15 26:11,	20:8 147:8
woman 99:6,	14,18 33:6	
10	36:16,21	yellow 133:8
women 57:23	37:4,10,	youngest
67:12	11,15 53:1	16:8
92:14,15	55:8,13,24	
118:1,7	57:23,25	Z
121:12	58:12	
	59:20	Zaccheus
word 81:1	83:25	149:5
words 13:4	97:22	
33:12	98:1,12	
	99:13	
work 25:17	112:22	
29:20	116:16	
31:13 42:1	126:8	
45:21 55:8	127:4,8,14	
61:14	136:8,12,	
80:20 87:7	16 141:15	
100:13		
102:17	works 13:10	
126:23,25	111:23	
127:6,11,		
12,13	worth 127:25	
worked	wound 41:20	
86:17,25		
87:9,12	written 10:5	
93:11	wrong 118:20	
101:7,12,	WTF 133:24	
13,22		
102:16,23		